EXHIBIT

2

PART II

DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL ANSWERS TO INTERROGATORIES, RESPONSES TO REQUESTS FOR PRODUCTION AND TO COMPEL SUBMISSION TO R.34 INSPECTION

	Case 1:07-cv-06362 Docume		•	Filed 03/06/2008 Page 2 of 24	
	Pa	ige 82	.,		Page 84
1	hourly basis. He only gets paid if you		1	Q. Has anybody?	. 490 01
2	win the case and attorneys' fees are		2	A. I don't know.	
3	awarded?		3	Q. To your knowledge, has	
4	A. You want to know what, I		4	anybody on behalf of you or on behalf	
5	don't		5		
6				of Disabled Patriots ever been to the	
	MR. BACON: Objection.		6	premises described in this complaint?	
7	A I don't know.	l	7	A. Beyond me?	
8	MR. BACON: Ms. Kramer is not		8	Q. Yes.	
9	qualified to answer that.	- 1	9	 A. Somebody generally goes out 	
10	A. I don't know.		10	to look and see what the complaint	
11	MR. LEONARD: She can give her		11	what my complaints are and if it's	
12	personal knowledge.		12	valid.	
13	Q. Ma'am, what's your		13	Q. Well, ma'am, I'm not asking	
14	understanding of how that works?		14	what generally happens. In this	
15	A. I don't know.		15	lawsuit, has anyone gone to these	
16	Q. Okay. So you've never paid	1	16	facilities to look at them?	
17	him any money?		17	A. I don't know.	
18	A. Never.		18	Q. You have no knowledge of	
19	Q. And he's never asked you pay		19		
20	him anything?		20	A. None.	
21	, -				
	A. Never.		21	Q. Okay. And you certainly	
22	Q. Even in all the cases he			haven't asked anyone to do that?	
23	served as an expert, you've never paid		23	A. I have not.	
24	him a dime?		24	Q. You haven't told anybody to	
25	A. Not a dime.	;	25	do that?	
				· · · · · · · · · · · · · · · · · · ·	
	Par	ne 83			Dago 85
1		ge 83	1	A. No.	Page 85
1 2	Q. And you've never seen a bill	ge 83	1 2	A. No. O. And to your knowledge that	Page 85
2	Q. And you've never seen a bill for him, correct?	ge 83	2	Q. And to your knowledge that	Page 85
2	Q. And you've never seen a bill for him, correct? A. Never.	ge 83	2 3	Q. And to your knowledge that hasn't happened?	Page 85
2 3 4	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled	ge 83	2 3 4	Q. And to your knowledge that hasn't happened? A. Correct.	Page 85
2 3 4 5	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever	ge 83	2 3 4 5	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not	Page 85
2 3 4 5 6	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him?	ge 83	2 3 4	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these	Page 85
2 3 4 5 6 7	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so.	ge 83	2 3 4 5 6 7	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports,	Page 85
2 3 4 5 6 7 8	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency	ge 83	2 3 4 5 6 7 8	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you?	Page 85
2 3 4 5 6 7 8	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis?		2 3 4 5 6 7 8 9	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that	Page 85
2 3 4 5 6 7 8 9	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes.		2 3 4 5 6 7 8 9	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took.	Page 85
2 3 4 5 6 7 8 9 10	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection.		2 3 4 5 6 7 8 9 10	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not	Page 85
2 3 4 5 6 7 8 9 10 11 12	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff		2 3 4 5 6 7 8 9 10 11	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of	Page 85
2 3 4 5 6 7 8 9 10 11 12 13	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid?		2 3 4 5 6 7 8 9 10 11 12 13	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't		2 3 4 5 6 7 8 9 10 11	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of	Page 85
2 3 4 5 6 7 8 9 10 11 12 13	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid?		2 3 4 5 6 7 8 9 10 11 12 13	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't		2 3 4 5 6 7 8 9 10 11 12 13	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even		2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No.	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No. Q. Okay. Well, in your	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works. Q. Okay. Have you retained him		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No. Q. Okay. Well, in your complaint that you filed in federal	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works. Q. Okay. Have you retained him in this case, ma'am?		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No. Q. Okay. Well, in your complaint that you filed in federal court, ma'am, you make reference to some	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works. Q. Okay. Have you retained him in this case, ma'am? A. I have not retained him, no.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No. Q. Okay. Well, in your complaint that you filed in federal court, ma'am, you make reference to some sort of preliminary assessment or	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works. Q. Okay. Have you retained him in this case, ma'am? A. I have not retained him, no. Q. Has anybody?		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No. Q. Okay. Well, in your complaint that you filed in federal court, ma'am, you make reference to some sort of preliminary report. You're not aware of	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works. Q. Okay. Have you retained him in this case, ma'am? A. I have not retained him, no. Q. Has anybody? A. I don't know.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 22	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No. Q. Okay. Well, in your complaint that you filed in federal court, ma'am, you make reference to some sort of preliminary assessment or preliminary report. You're not aware of that ever happening, are you, ma'am?	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works. Q. Okay. Have you retained him in this case, ma'am? A. I have not retained him, no. Q. Has anybody? A. I don't know. Q. Have you retained any experts		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No. Q. Okay. Well, in your complaint that you filed in federal court, ma'am, you make reference to some sort of preliminary report. You're not aware of that ever happening, are you, ma'am? A. I don't know what the	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works. Q. Okay. Have you retained him in this case, ma'am? A. I have not retained him, no. Q. Has anybody? A. I don't know. Q. Have you retained any experts with respect to this case?		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No. Q. Okay. Well, in your complaint that you filed in federal court, ma'am, you make reference to some sort of preliminary assessment or preliminary report. You're not aware of that ever happening, are you, ma'am? A. I don't know what the procedures are.	Page 85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. And you've never seen a bill for him, correct? A. Never. Q. Okay. Does Disabled Patriots, does that organization ever pay him? A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works. Q. Okay. Have you retained him in this case, ma'am? A. I have not retained him, no. Q. Has anybody? A. I don't know. Q. Have you retained any experts		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. And to your knowledge that hasn't happened? A. Correct. Q. Okay. And you have not prepared any reports about these facilities or any preliminary reports, have you? A. No, beyond the photos that we took. Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am? A. No. Q. Okay. Well, in your complaint that you filed in federal court, ma'am, you make reference to some sort of preliminary report. You're not aware of that ever happening, are you, ma'am? A. I don't know what the	Page 85

	Case 1.07-CV-00302 D00	Junient 18		Filed 03/00/2006 Fage 3 01 24	
		Page 86			Page 88
1	this case and in your complaint you make		1	Q. Now, when you spoke to	
2	reference to some kind of preliminary		2	Pedraza whenever this was and you don't	
3	assessment or preliminary report but you		3	recall when it was, right?	
4	have no idea what that means, do you?		4	A. No.	
5	A. Not really.		5	Q. And you don't recall whether	
6	Q. Because you're not aware of		6	it was over the phone or by e-mail?	
7	that ever happening, right?		7	A. No, I'm sure it was a phone	
8	A. I don't have anything to do		8	conversation.	
	with that.		9		
9			_	Q. Okay. Do you have any idea	
10	Q. Okay. Now, your recollection		10	what you said to Pedraza on that	
11	is you contacted Pedraza sometime after		11	occasion and what he said to you?	
12	August of 07, right?		12	A. Well, I think he asked me	
13	 A. Correct, or we may have been 		13	how my trip to Chicago was and I talked	
14	talking about another issue at the time.		14	about my the time that I spent with	
15	Q. Would your journal tell us		15	my son.	
16	when you talked to Pedraza for the first		16	Q. Okay. Do you say anything	
17	time about these premises that are the		17	else to him?	
18	subject of your lawsuit?		18	A. Yeah, that I mean, Chicago	
19	A. I doubt that I would include		19	was really, really inaccessible and it	
20	a journal entry about talking to Dave		20	just felt like a gigantic obstacle	
21	Pedraza on the phone.		21	course, which is what going around the	
22	Q. You were also exchanging		22	world is in general, but Chicago was	
23	e-mails with Pedraza?		23	worse than Cleveland. That was my	
24	A. Rarely.		24	observation.	
25	Q. Sometimes?		25	Q. Did you tell Pedraza anything	
		Page 87			Page 89
1	A. Occasionally.	Page 87	1	about the premises that we've been	Page 89
1 2	A. Occasionally. O. What is your e-mail address?	Page 87	1 2	about the premises that we've been talking about that are the subject of	Page 89
2	Q. What is your e-mail address?	Page 87	2	talking about that are the subject of	Page 89
2 3	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia	Page 87	2	talking about that are the subject of your lawsuit?	Page 89
2 3 4	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net.	Page 87	2 3 4	talking about that are the subject of your lawsuit? A. I said that we had been to a	Page 89
2 3 4 5	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had	Page 87	2 3 4 5	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls	Page 89
2 3 4 5 6	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address?	Page 87	2 3 4 5 6	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to.	Page 89
2 3 4 5 6 7	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to	Page 87	2 3 4 5 6 7	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for	Page 89
2 3 4 5 6 7 8	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake.	Page 87	2 3 4 5 6 7 8	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you?	Page 89
2 3 4 5 6 7 8 9	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that?	Page 87	2 3 4 5 6 7 8 9	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for	Page 89
2 3 4 5 6 7 8	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake.	Page 87	2 3 4 5 6 7 8	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you?	Page 89
2 3 4 5 6 7 8 9	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that?	Page 87	2 3 4 5 6 7 8 9	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or	Page 89
2 3 4 5 6 7 8 9 10 11	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March.	Page 87	2 3 4 5 6 7 8 9 10	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any	Page 89
2 3 4 5 6 7 8 9 10 11 12	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address?	Page 87	2 3 4 5 6 7 8 9 10 11	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so?	Page 89
2 3 4 5 6 7 8 9 10 11 12 13	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast	Page 87	2 3 4 5 6 7 8 9 10 11 12 13	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No.	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net.	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail?	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities?	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail? A. Two years.	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities? Did he ever look into them?	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail? A. Two years. Q. Okay. Did you know what	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities? Did he ever look into them? Explain about	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail? A. Two years. Q. Okay. Did you know what your e-mail before that was?	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities? Did he ever look into them? Explain about A. He might have and I can't	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail? A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities? Did he ever look into them? Explain about A. He might have and I can't tell you if he did or not. I assume he	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail? A. Two years. Q. Okay. Did you know what your e-mail before that was?	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities? Did he ever look into them? Explain about A. He might have and I can't	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail? A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities? Did he ever look into them? Explain about A. He might have and I can't tell you if he did or not. I assume he	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail? A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947 and they've been different internet providers.	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities? Did he ever look into them? Explain about A. He might have and I can't tell you if he did or not. I assume he did. Q. But if he did, it wouldn't	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail? A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947 and they've been different internet providers. Q. What are some of the other	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities? Did he ever look into them? Explain about A. He might have and I can't tell you if he did or not. I assume he did. Q. But if he did, it wouldn't be because of you because you have no	Page 89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. What is your e-mail address? A. B O N I T A 1947 at Adelphia dot net. Q. And how long have you had that e-mail address? A. Since I moved to back to Cleveland Heights from Avon Lake. Q. When was that? A. It'll be two years in March. Q. What was your prior e-mail address? A. B O N I T A 1947 at Comcast dot net. Q. And how long did you have that e-mail? A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947 and they've been different internet providers.	Page 87	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	talking about that are the subject of your lawsuit? A. I said that we had been to a variety of places, shopping areas, malls that we had been to. Q. But you didn't identify for him this one, did you? A. I'm not sure if I did or not. Q. Okay. You don't have any recollection of doing so? A. No. Q. And then did Pedraza ever do anything with respect to these facilities? Did he ever look into them? Explain about A. He might have and I can't tell you if he did or not. I assume he did. Q. But if he did, it wouldn't	Page 89

			9- 3	Filed 03/00/2006 Fage 4 01 24	
		Page 90	-		Page 92
1	A. Well, I knew what the name		1	Q. But before you filed the	
2	of the place was.		2	lawsuit, you have no knowledge that he's	
3	Q. What did you think it was		3	ever been there, right?	
4	called?		4	A. I am very I'm learning	
5	A. Town & Country Mall.		5	more daily about what the ADA	
6	Q. Okay. And did you identify		6	specifications are. And I do a lot of	
7	the mall for him?		7	lawsuits, as I'm sure you're aware of.	
8	A. I told him that it was in		8	What I'm saying to you is, I'm not	
9	Arlington Heights, I think.		9	exactly sure what the order of things	
10	_ · · · · · · · · · · · · · · · · · · ·		10		
l .	Q. And did you tell him what it			are but I do know that an expert goes	
11	was called?		11	out to make sure that what I'm saying	
12	A. Yeah, I think I said that we		12	is actual. That they're actual	
13	went to a Town & Country Mall.		13	violations.	
14	Q. And what did you tell him		14	Q. That's what you think	
15	about Town & Country Mall?		15	supposed to happen, right?	
16	 A. That there were a million 		16	 A. I know that's what happens. 	
17	things wrong.		17	Q. Well, I'm talking about this	
18	Q. Did you tell him anything		18	case. I'm not talking about in general,	
19	more specific then that?		19	ma'am.	
20	A. No.		20	A. Okay.	
21	Q. And were you telling him so		21	Q. In this case, before you	
22	that he would go out there and look at		22	went to federal court and filed a	
23	it?		23	lawsuit, you have no knowledge	:
24	A. Maybe on his next visit to		24	whatsoever that anybody ever went to	
25	Chicago.		25	Town & Country and looked at these	
	cricago.		23	Town & Country and looked at these	
		Page 91			Page 93
1	Q. Has he been to Chicago or		1	alleged violations, right?	
2	the Chicago area since you talked to him		2	 A. I know that Dave Pedraza 	
3	back in August of 072			must have taken a look at the property	
)	back in August of 07?		3	must have taken a look at the property.	
4			3 4	must have taken a look at the property. Q. Oh, so he did go there?	
4	A. I think he's been there a		4	Q. Oh, so he did go there?	
4 5	A. I think he's been there a couple of times.		4 5	Q. Oh, so he did go there?A. I think he did.	
4 5 6	A. I think he's been there a couple of times. Q. Has he ever been to the Town		4 5 6	Q. Oh, so he did go there?A. I think he did.Q. When did he go there?	
4 5 6 7	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge?		4 5 6 7	Q. Oh, so he did go there?A. I think he did.Q. When did he go there?A. I don't know.	
4 5 6 7 8	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has		4 5 6 7 8	Q. Oh, so he did go there?A. I think he did.Q. When did he go there?A. I don't know.Q. Did he tell you he went	
4 5 6 7 8 9	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been		4 5 6 7 8 9	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there?	
4 5 6 7 8 9	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there.		4 5 6 7 8 9	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember.	
4 5 6 7 8 9 10	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you		4 5 6 7 8 9 10	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told	
4 5 6 7 8 9 10 11 12	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there?		4 5 6 7 8 9 10 11 12	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not?	
4 5 6 7 8 9 10 11 12 13	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No.		4 5 6 7 8 9 10 11 12 13	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No.	
4 5 6 7 8 9 10 11 12 13	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any		4 5 6 7 8 9 10 11 12 13 14	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever	
4 5 6 7 8 9 10 11 12 13 14 15	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about		4 5 6 7 8 9 10 11 12 13 14 15	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report?	
4 5 6 7 8 9 10 11 12 13 14 15 16	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you?		4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No.	
4 5 6 7 8 9 10 11 12 13 14 15	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about		4 5 6 7 8 9 10 11 12 13 14 15	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report?	
4 5 6 7 8 9 10 11 12 13 14 15 16	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you?		4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No.	
4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you? A. No, but I'm saying that we don't enter into these lawsuits		4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No. Q. Or assessment? A. No.	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you? A. No, but I'm saying that we don't enter into these lawsuits frivolously.		4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No. Q. Or assessment? A. No. Q. Or findings or anything about	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you? A. No, but I'm saying that we don't enter into these lawsuits frivolously. Q. Okay. Well, I'm trying to		4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No. Q. Or assessment? A. No. Q. Or findings or anything about this facility?	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you? A. No, but I'm saying that we don't enter into these lawsuits frivolously. Q. Okay. Well, I'm trying to understand what went on here. So you		4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No. Q. Or assessment? A. No. Q. Or findings or anything about this facility? A. I have never seen a report	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you? A. No, but I'm saying that we don't enter into these lawsuits frivolously. Q. Okay. Well, I'm trying to understand what went on here. So you talked to him. You mentioned this mall		4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No. Q. Or assessment? A. No. Q. Or findings or anything about this facility? A. I have never seen a report on this property.	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you? A. No, but I'm saying that we don't enter into these lawsuits frivolously. Q. Okay. Well, I'm trying to understand what went on here. So you talked to him. You mentioned this mall to him and then at some point in time		4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No. Q. Or assessment? A. No. Q. Or findings or anything about this facility? A. I have never seen a report on this property. Q. And he had never mentioned	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you? A. No, but I'm saying that we don't enter into these lawsuits frivolously. Q. Okay. Well, I'm trying to understand what went on here. So you talked to him. You mentioned this mall to him and then at some point in time you filed this lawsuit, right?		4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No. Q. Or assessment? A. No. Q. Or findings or anything about this facility? A. I have never seen a report on this property. Q. And he had never mentioned this property to you again, has he?	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I think he's been there a couple of times. Q. Has he ever been to the Town & County Mall to your knowledge? A. I don't know but if he has written a report, he has absolutely been there. Q. But he's never told you about being there? A. No. Q. And you're not aware of any report he's ever put together about these premises, are you? A. No, but I'm saying that we don't enter into these lawsuits frivolously. Q. Okay. Well, I'm trying to understand what went on here. So you talked to him. You mentioned this mall to him and then at some point in time		4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember. Q. So you don't know if he told you that or not? A. No. Q. Okay. Well, did he ever show you any sort of report? A. No. Q. Or assessment? A. No. Q. Or findings or anything about this facility? A. I have never seen a report on this property. Q. And he had never mentioned	

			1-5	Filed 03/06/2008 Page 5 of 24	
		Page 94			Page 9
1	Q. Okay. So you talked to him		1	Q. Okay. And you didn't	
2	on this one occasion in August or		2	communicate in writing, by e-mail, memo,	
3	thereabouts.		3	letter, note or otherwise with anyone	
4	A. Right.		4	about this facility prior to yesterday,	
5	Q. And you've never spoken to		5	correct?	
6	him about this facility since, have you,		6	A. No, that's correct.	
7	ma'am?		7	Q. And to your knowledge, nobody	
8	A. I don't think we've ever		8	on your behalf has ever been out to	
9	spoken about this property again ever.		9	Town & Country to do an inspection of	
10	Q. You have not?		10	the premises, right?	
11	A. Have not.		11	A. You're best asking Mr. Bacon	
12	Q. Okay. And have you ever		12	about that.	
13	spoken to anybody about this property		13		
14	besides Mr. Pedraza the one time we		14	Q. Well, no, you're the	
15	talked about?			plaintiff in the case. I want to know	
			15	what you know.	
16	A. No, except for the attorneys.		16	A. I'm telling you that there	
17	Q. Okay. We'll get into that		17	is a procedure and it was followed and	
18	in a minute. But with respect to		18	I'm not sure exactly how it works.	
19	Pedraza, have you told me to the best		19	Q. Well, did someone go out to	
20	of your recollection everything you can		20	Town & Country after August of 07 or	
21	remember telling him during your		21	did they not?	
22	telephone conversation?		22	A. Yes, they did.	
23	A. Yes.		23	Q. Who?	
24	Q. Okay. And that telephone		24	A. I assume it was Dave	
25	conversation was to discuss a variety of		25	Pedraza.	
		Page 95			Page 9
1	matters, right?		1	Q. Well, you just told me you	
2	A Voc				
4	A. Yes.		2	didn't know if he's ever been there.	
			2		
3	Q. So the part about Town &		3	A. I'm assuming that that's what	
3 4	Q. So the part about Town & Country might have been 30 seconds or		3 4	A. I'm assuming that that's what happens is	
3 4 5	Q. So the part about Town & Country might have been 30 seconds or less, is that right?		3 4 5	A. I'm assuming that that's what happens is Q. Well, if he's been there, he	
3 4 5 6	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes.		3 4 5 6	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you,	
3 4 5 6 7	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes		3 4 5 6 7	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right?	
3 4 5 6 7 8	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you?		3 4 5 6 7 8	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it.	
3 4 5 6 7 8 9	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No.		3 4 5 6 7 8 9	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an	
3 4 5 6 7 8 9	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to		3 4 5 6 7 8 9 10	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you	
3 4 5 6 7 8 9 l0	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today		3 4 5 6 7 8 9 10	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there?	
3 4 5 6 7 8 9 10 11	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this		3 4 5 6 7 8 9 10 11 12	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No.	
3 4 5 6 7 8 9 10 11 12	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared		3 4 5 6 7 8 9 10 11 12 13	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't	
3 4 5 6 7 8 9 10 11 12	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon		3 4 5 6 7 8 9 10 11 12 13 14	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked?	
3 4 5 6 7 8 9 10 11 12 13 14	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday?		3 4 5 6 7 8 9 10 11 12 13 14 15	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me?	
3 4 5 6 7 8 9 .0 .1 .2 .3 .4	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday? A. No.		3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me? MR. BACON: It's been asked and	
3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday? A. No. Q. No, is that right?		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me?	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday? A. No. Q. No, is that right? A. No.		3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me? MR. BACON: It's been asked and	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday? A. No. Q. No, is that right?		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me? MR. BACON: It's been asked and answered.	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday? A. No. Q. No, is that right? A. No.		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me? MR. BACON: It's been asked and answered. MR. LEONARD: I'm just trying to	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday? A. No. Q. No, is that right? A. No. Q. Okay. So the only one		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me? MR. BACON: It's been asked and answered. MR. LEONARD: I'm just trying to get clear on some of this, counsel. Q. Ma'am, have you ever seen	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 1	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday? A. No. Q. No, is that right? A. No. Q. Okay. So the only one you've ever talked to about this facility was Pedraza for 30 seconds and		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me? MR. BACON: It's been asked and answered. MR. LEONARD: I'm just trying to get clear on some of this, counsel. Q. Ma'am, have you ever seen any of the expert disclosures made by	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 1 22 2	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday? A. No. Q. No, is that right? A. No. Q. Okay. So the only one you've ever talked to about this facility was Pedraza for 30 seconds and then Mr. Bacon yesterday, right?		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me? MR. BACON: It's been asked and answered. MR. LEONARD: I'm just trying to get clear on some of this, counsel. Q. Ma'am, have you ever seen any of the expert disclosures made by your attorneys in this case?	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. So the part about Town & Country might have been 30 seconds or less, is that right? A. Yes. Q. And you don't have any notes about that conversation, do you? A. No. Q. Okay. Now, so you spoke to Pedraza. Did you ever prior to today speak to anybody else about this facility other than when you prepared for your deposition with Mr. Bacon yesterday? A. No. Q. No, is that right? A. No. Q. Okay. So the only one you've ever talked to about this facility was Pedraza for 30 seconds and		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. I'm assuming that that's what happens is Q. Well, if he's been there, he certainly never mentioned it to you, right? A. We never talked about it. There's an Q. Is there anyone else you suspect might have gone out there? A. No. MR. BACON: Objection. Hasn't this all been asked? MR. LEONARD: Excuse me? MR. BACON: It's been asked and answered. MR. LEONARD: I'm just trying to get clear on some of this, counsel. Q. Ma'am, have you ever seen any of the expert disclosures made by	

	Case 1:07-cv-06362 Doct	iment 18	, ,	Filed 03/06/2008 Page 6 of 24	
		Page 98			Page 100
1	A. No.		1	A. Three years ago.	J
2	Q. And they never told you?		2	Q. And before we get to that,	
3	A. No.		3	what's Pedraza's e-mail?	
4	Q. So you don't know who your		4	A. I don't know.	
5	experts are in this case?		5		
6	A. I'm assuming Mr. Pedraza's		6	Q. You have that available,	
7			ı	though, right?	
	the person I've worked with.		7	A. Yes.	
8	Q. Anybody else who you think		8	Q. Three years ago, how did you	
9	might be your expert in this case?		9	become a member of Disabled Patriots?	
10	A. No.		10	A. Again, through talking to	
11	Q. Okay. How is Mr. Pedraza		11	in the conversation with Dave.	
12	being paid, with regard to this case?		12	Q. Mr. Pedraza?	
13	A. I don't know.		13	A. Yes, he told me about this	
14	Q. You don't have any agreement		14	organization out of Southern Florida.	
15	with him, do you?		15	Q. Okay. So the first time	
16	A. No.		16	that your friend kind of put you guys	
17	Q. Does he have an agreement		17	together a few years ago, Pedraza is the	
18	with anybody?		18		
19	A. I don't know.		19	one that brings it up, right?	
				A. Yes.	
20	Q. So if you happen to recover		20	Q. And what did he tell you at	
21	attorneys' fees or costs, that's how you		21	the time about the organization?	
22	think Pedraza will get paid?		22	A. He said that it was a little	
23	A. I don't know.		23	grassroots organization that was doing a	
24	MR. BACON: Objection. Asked and		24	lot of advocacy.	
25	answered. Mrs. Kramer does not know.		25	Q. Did he tell you anything	
		D 00			
4	O Mall malam in value ather	Page 99	,	alaa ahaus #2	Page 101
1	Q. Well, ma'am, in your other	Page 99	1	else about it?	Page 101
2	cases you brought where you've included	Page 99	2	A. No.	Page 101
2	cases you brought where you've included Pedraza as an expert, you've never paid	Page 99	2 3	A. No. Q. When did you join it?	Page 101
2 3 4	cases you brought where you've included Pedraza as an expert, you've never paid him, right?	Page 99	2 3 4	A. No.Q. When did you join it?A. At that time.	Page 101
2 3 4 5	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never.	Page 99	2 3 4 5	A. No.Q. When did you join it?A. At that time.Q. How?	Page 101
2 3 4	cases you brought where you've included Pedraza as an expert, you've never paid him, right?	Page 99	2 3 4	A. No.Q. When did you join it?A. At that time.	Page 101
2 3 4 5	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never.	Page 99	2 3 4 5	A. No.Q. When did you join it?A. At that time.Q. How?	Page 101
2 3 4 5 6	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the	Page 99	2 3 4 5 6	A. No.Q. When did you join it?A. At that time.Q. How?A. I signed an application.	Page 101
2 3 4 5 6 7	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you	Page 99	2 3 4 5 6 7	A. No.Q. When did you join it?A. At that time.Q. How?A. I signed an application.Q. Who gave you the application?	Page 101
2 3 4 5 6 7 8	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a	Page 99	2 3 4 5 6 7 8 9	 A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. 	Page 101
2 3 4 5 6 7 8 9	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the	Page 99	2 3 4 5 6 7 8 9	 A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? 	Page 101
2 3 4 5 6 7 8 9 10	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right?	Page 99	2 3 4 5 6 7 8 9 10	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team	Page 101
2 3 4 5 6 7 8 9 10 11 12	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it.	Page 99	2 3 4 5 6 7 8 9 10 11 12	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been	Page 101
2 3 4 5 6 7 8 9 10 11 12 13	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any	Page 99	2 3 4 5 6 7 8 9 10 11 12 13	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address.	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right?	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never.	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization?	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an agreement with Mr. Bacon's office to	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part of the monitoring stuff. It might be	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an agreement with Mr. Bacon's office to your knowledge?	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part of the monitoring stuff. It might be an organization that Dave runs or works	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an agreement with Mr. Bacon's office to your knowledge? A. I have no idea.	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part of the monitoring stuff. It might be an organization that Dave runs or works with.	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an agreement with Mr. Bacon's office to your knowledge? A. I have no idea. Q. Okay. You have no idea	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part of the monitoring stuff. It might be an organization that Dave runs or works with. Q. Well, let me get this	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an agreement with Mr. Bacon's office to your knowledge? A. I have no idea.	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part of the monitoring stuff. It might be an organization that Dave runs or works with.	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an agreement with Mr. Bacon's office to your knowledge? A. I have no idea. Q. Okay. You have no idea	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part of the monitoring stuff. It might be an organization that Dave runs or works with. Q. Well, let me get this	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an agreement with Mr. Bacon's office to your knowledge? A. I have no idea. Q. Okay. You have no idea about that, right? A. None.	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part of the monitoring stuff. It might be an organization that Dave runs or works with. Q. Well, let me get this straight. You talked to Pedraza? A. Yeah.	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an agreement with Mr. Bacon's office to your knowledge? A. I have no idea. Q. Okay. You have no idea about that, right? A. None. Q. Ma'am, when did you become a	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part of the monitoring stuff. It might be an organization that Dave runs or works with. Q. Well, let me get this straight. You talked to Pedraza? A. Yeah. Q. And he tells you about this	Page 101
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	cases you brought where you've included Pedraza as an expert, you've never paid him, right? A. Never. Q. To your understanding, the way he's gotten paid in those other cases is if his attorney if you prevail either by settlement or by a judgment, then he gets money out of the attorneys' fees and costs, right? A. That's how I understand it. Q. You've never ever had any agreement with him, is that right? A. Never. Q. Okay. Does Pedraza have an agreement with Mr. Bacon's office to your knowledge? A. I have no idea. Q. Okay. You have no idea about that, right? A. None.	Page 99	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. When did you join it? A. At that time. Q. How? A. I signed an application. Q. Who gave you the application? A. I think he gave it to me and I mailed it to an address in Florida. Q. To whose office? A. It was to an ADA access team office address or it might have been Disabled Patriots address. Q. What is ADA access team? Is that a different organization? A. It's I don't it's part of the monitoring stuff. It might be an organization that Dave runs or works with. Q. Well, let me get this straight. You talked to Pedraza? A. Yeah.	Page 101

	Case 1:07-cv-06362 D0		9-5	Filed 03/06/2008 Page 7 of 24	
		Page 102			Page 104
1	Patriots at the time?		1	Q. When?	
2	A. Yes.		2	 A. It was not long after I 	
3	Q. Okay. And he sent you an		3	joined the organization.	
4	application?		4	Q. Let me just get this	
5	A. Yes.		5	straight. You submit this piece of	
6	Q. And then do you send it back		6	paper through the mail?	
7	to him or do you send it back to		7	A. Right.	
8	Disabled Patriots?		8	Q. And your assumption is that	
			1	• • • • • • • • • • • • • • • • • • • •	
9	A. I don't think I sent it back		9	you're now a member?	
10	to him. I think I mailed it someplace.		10	A. Yes.	
11	Q. At the time, was he like an		11	Q. But they don't send you	
12	employee, agent of Disabled Patriots		12	anything back a certificate, a card,	
13	A. No.		13	anything to say you're now a member?	
14	Q anything like that?		14	A. That is correct.	
15	A. No, he wasn't. He was just		15	Q. And you've never received	
16	aware of them.		16	anything like that from them?	
17	Q. Okay. And what did you do		17	A. That is correct.	
18	to have to become a member? Just fill		18	Q. How do you know you're	
19	out a card?		19	really a member?	
20	A. Nothing. Just to fill out		20	A. Because there's 20 of us and	
			21		
21	an application. It basically just		1	we talk about it. And we had a meeting	
22	talked about how long I had been		22	in Pittsburgh this summer and talked	
23	disabled.		23	about it there.	
24	Q. Okay.		24	Q. Okay. And so there's only	
25	A. The nature of my disability		25	20 members of the organization?	
		Dags 102			D 10F
I		Page 103			Page 105
1	but people are welcome to join who are	Page 103	1	A. Yes.	Page 105
1 2	but people are welcome to join who are not disabled.	Page 103	1 2	A. Yes. O. Okav.	Page 105
2	not disabled.	Page 103	2	Q. Okay.	Page 105
2 3	not disabled. Q. Okay. So you don't have to	Page 103	2	Q. Okay. A. Might not even be 20. I	Page 105
2 3 4	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled	Page 103	2 3 4	Q. Okay. A. Might not even be 20. I don't know exactly the number.	Page 105
2 3 4 5	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots?	Page 103	2 3 4 5	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots,	rage 105
2 3 4 5 6	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct.	Page 103	2 3 4 5 6	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their	Page 105
2 3 4 5 6 7	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an	Page 103	2 3 4 5 6 7	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization?	rage 105
2 3 4 5 6 7 8	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative,	Page 103	2 3 4 5 6 7 8	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through	rage 105
2 3 4 5 6 7 8	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled	Page 103	2 3 4 5 6 7 8 9	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on	rage 105
2 3 4 5 6 7 8 9	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots?	Page 103	2 3 4 5 6 7 8 9	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a	rage 105
2 3 4 5 6 7 8	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled	Page 103	2 3 4 5 6 7 8 9 10	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be	Page 105
2 3 4 5 6 7 8 9	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots?	Page 103	2 3 4 5 6 7 8 9	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a	Page 105
2 3 4 5 6 7 8 9 10	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member?	Page 103	2 3 4 5 6 7 8 9 10	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be	rage 105
2 3 4 5 6 7 8 9 10 11	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never.	Page 103	2 3 4 5 6 7 8 9 10 11	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure.	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join?	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No.	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece of paper, right?	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the Disabled Patriots coffers.	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece of paper, right? A. Yes.	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the Disabled Patriots coffers. Q. Okay. Now, when you joined	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece of paper, right? A. Yes. Q. And then did someone send	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the Disabled Patriots coffers. Q. Okay. Now, when you joined the organization or you thought you	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece of paper, right? A. Yes. Q. And then did someone send you something back to say you've been	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the Disabled Patriots coffers. Q. Okay. Now, when you joined the organization or you thought you joined it a few years ago	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece of paper, right? A. Yes. Q. And then did someone send you something back to say you've been accepted as a member?	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the Disabled Patriots coffers. Q. Okay. Now, when you joined the organization or you thought you joined it a few years ago A. Yes.	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece of paper, right? A. Yes. Q. And then did someone send you something back to say you've been accepted as a member? A. No, but I spoke with Maria	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the Disabled Patriots coffers. Q. Okay. Now, when you joined the organization or you thought you joined it a few years ago A. Yes. Q how many members were	rage 105
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	not disabled. Q. Okay. So you don't have to be disabled to be a member of Disabled Patriots? A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots? A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece of paper, right? A. Yes. Q. And then did someone send you something back to say you've been accepted as a member?	Page 103	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Okay. A. Might not even be 20. I don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the Disabled Patriots coffers. Q. Okay. Now, when you joined the organization or you thought you joined it a few years ago A. Yes.	rage 105

1					
1		Page 106			Page 108
	A. Ten maybe.		1	A. Maria Gallagher, who is the	
2	Q. Okay. And are those ten		2	president of this organization and I	
3	people still members.		3	wanted to get together and start mapping	
4	A. I think so.		4	out a plan by which we could grow this	
5	Q. Okay. And can I go to a web		5	origination.	
6	site or anything like that to figure out		6	Q. Maria Gallagher is the	
7	anything about the organization?		7	president of Disabled Patriots?	
8	A. No, but it's coming.		8	A. Correct.	
9	Q. There is no web site?		9	Q. How long has she held that	
10	A. Right.		10	title?	
11	Q. There's never been?		11	 A. From the beginning of 	
12	A. No.		12	Disabled Patriots. I'm assuming it's	
13	Q. And it doesn't have any		13	five or six years.	
14	newsletter?		14	Q. Do you know when the	
15	A. No.		15	organization started?	
16	Q. And it's never had a		16	A. No, I don't know the exact	
17	newsletter?		17	date.	
18	A. No, but those are all things		18	Q. Okay. Who made her	
19	that are in the works.		19	president? She just said she's	
			ľ		
20	Q. Okay. And is there any list		20	president?	
21	anywhere in the world I can get of its		21	A. Well, she started the	
22	membership?		22	organization so	
23	A. Yes, I'm sure there is a		23	Q. Is she disabled?	
24	list and I'm not, you know		24	 A. No, she's not but she was a 	
25	Q. But you've never seen one?		25	caretaker. That's how she got into	
		Page 107			Page 109
1	A. I've heard the names	Page 107	1	this.	Page 109
2	mentioned but I have never I've never		2	Q. Where does she live?	
3	seen the list, no.		3	A. Southern Florida,	
lα	O Okay So you'yo noyor coon		1 4		
4	Q. Okay. So you've never seen		4	Philadelphia. She's living in	
5	the list. You don't know whether one		5	Philadelphia. She's living in Philadelphia now, I think.	
5 6	the list. You don't know whether one exists?			Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her	
5 6 7	the list. You don't know whether one exists? A. Right.		5 6 7	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money?	
5 6 7 8	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think		5	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again,	
5 6 7 8 9	the list. You don't know whether one exists? A. Right.		5 6 7 8 9	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life.	
5 6 7 8	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think		5 6 7 8	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again,	
5 6 7 8 9	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do		5 6 7 8 9	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life.	
5 6 7 8 9	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a		5 6 7 8 9	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots?	
5 6 7 8 9 10 11 12	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the		5 6 7 8 9 10 11 12	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's	
5 6 7 8 9 10 11 12 13	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted.		5 6 7 8 9 10 11 12 13	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at	
5 6 7 8 9 10 11 12 13 14	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that		5 6 7 8 9 10 11 12 13 14	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point.	
5 6 7 8 9 10 11 12 13 14 15	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place?		5 6 7 8 9 10 11 12 13 14 15	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of	
5 6 7 8 9 10 11 12 13 14 15 16	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer.		5 6 7 8 9 10 11 12 13 14 15 16	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit	
5 6 7 8 9 10 11 12 13 14 15 16	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit		5 6 7 8 9 10 11 12 13 14 15 16 17	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is	
5 6 7 8 9 10 11 12 13 14 15 16 17 18	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago?		5 6 7 8 9 10 11 12 13 14 15 16 17 18	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe	
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago? A. No, it was after that. So		5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe in the work.	
5 6 7 8 9 10 11 12 13 14 15 16 17 18	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago?		5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe	
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago? A. No, it was after that. So		5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe in the work.	
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago? A. No, it was after that. So it might have been early in the autumn		5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe in the work. Q. Okay. And are there any	
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago? A. No, it was after that. So it might have been early in the autumn or in the autumn. Q. Where was the meeting held?		5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe in the work. Q. Okay. And are there any other officers of Disabled Patriots	
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago? A. No, it was after that. So it might have been early in the autumn or in the autumn. Q. Where was the meeting held? A. In a hotel in Pittsburgh		5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe in the work. Q. Okay. And are there any other officers of Disabled Patriots besides Ms. Gallagher?	
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	the list. You don't know whether one exists? A. Right. Q. Okay. And how do you think there's 18 or 19 other members? How do you think those people exist? A. Because I was sitting at a meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago? A. No, it was after that. So it might have been early in the autumn or in the autumn. Q. Where was the meeting held?		5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Philadelphia. She's living in Philadelphia now, I think. Q. And how does she earn her money? A. A variety of ways. Again, she's been a caretaker most of her life. Q. And does she get paid by Disabled Patriots? A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe in the work. Q. Okay. And are there any other officers of Disabled Patriots besides Ms. Gallagher? A. There are but I don't know	

	Case 1.07-CV-00302 D00			Filed 03/00/2006 Fage 9 0i 24	
		Page 110			Page 112
1	are?		1	there?	
2	A. No.		2	 A. It was mostly getting 	
3	Q. What other positions are		3	together so that I could talk to Maria.	
4	there beside president?		4	Q. Just so I'm clear, it was	
5	A. I'm		5	you, Ms. Gallagher, and you can't	
6	MR. BACON: Brain, I don't mean		6	identify anybody else who was there?	
7	to interrupt but if I can interject for		7	A. Correct.	
8	the record, Ms. Kramer herself is an		8	Q. Was anybody else there?	
9	officer and director of Disabled		9	A. Yes.	į
10	Patriots.		10	Q. Are they members of the	
11	A. Right.		11	organization?	
12	MR. LEONARD: Counsel, I'm going		12	A. I don't know.	
13	to object to you coaching your witness.		13	Q. Was Mr. Bacon there?	
14	If you have an objection to make, fine		14	A. No.	
15	but you can't direct or provide		15	Q. Were any attorneys there?	
16	testimony to your witness. Okay. Our		16	A. No.	
17	rules don't allow it in the North		17	Q. Does Disabled Patriots have]:
18	District of Illinois. I'm sure it's the		18	an office?	
19	same down in Florida.		19	A. There's they have a small	
20	Q. Ma'am, what other positions		20	· · · · · · · · · · · · · · · · · · ·	
21			21	office right now in Southern Florida.	
22	are there besides president within this		22	Q. What town?	
	organization?			A. I don't know.	
23	A. I'm a director and		23	Q. No idea?	
24	vice-president.		24	A. Hm-hm.	
25	Q. Okay. Why is it when I		25	Q. You have to say yes or no.	
		Page 111			Page 113
1	asked you before about the other	Page 111	1	A. No, if I have to reach Maria	Page 113
1 2	asked you before about the other officers, you had no idea what I was	Page 111	1 2	A. No, if I have to reach Maria Gallagher, I usually call her by phone.	Page 113
2	officers, you had no idea what I was	Page 111	2	Gallagher, I usually call her by phone.	Page 113
2	officers, you had no idea what I was talking about? Now, as your attorney	Page 111	2	Gallagher, I usually call her by phone. Q. Well, how do you know they	Page 113
2 3 4	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president,	Page 111	2 3 4	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office?	Page 113
2 3 4 5	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a	Page 111	2 3 4 5	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have	Page 113
2 3 4 5 6	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president?	Page 111	2 3 4 5 6	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that.	Page 113
2 3 4 5 6 7	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking	Page 111	2 3 4 5 6 7	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there,	Page 113
2 3 4 5 6 7 8	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir.	Page 111	2 3 4 5 6 7 8	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right?	Page 113
2 3 4 5 6 7 8 9	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria	Page 111	2 3 4 5 6 7 8 9	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not.	Page 113
2 3 4 5 6 7 8 9	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher.	Page 111	2 3 4 5 6 7 8 9	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in?	Page 113
2 3 4 5 6 7 8 9 10	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer.	Page 111	2 3 4 5 6 7 8 9 10	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know.	Page 113
2 3 4 5 6 7 8 9 10 11	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been	Page 111	2 3 4 5 6 7 8 9 10 11 12	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at	Page 113
2 3 4 5 6 7 8 9 10 11 12 13	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer?	Page 111	2 3 4 5 6 7 8 9 10 11 12 13	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time?	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this pastat this past meeting.	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine.	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting?	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it?	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes.	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep.	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting?	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is?	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting? A. Five or six.	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is? A. I don't know the address	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting? A. Five or six. Q. Who was there?	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is? A. I don't know the address location.	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting? A. Five or six. Q. Who was there? A. I don't remember exactly who	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is? A. I don't know the address location. Q. You're a vice-president and	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting? A. Five or six. Q. Who was there? A. I don't remember exactly who was there.	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is? A. I don't know the address location. Q. You're a vice-president and director of the organization and you	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting? A. Five or six. Q. Who was there? A. I don't remember exactly who was there. Q. So it was you, Ms. Gallagher	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is? A. I don't know the address location. Q. You're a vice-president and director of the organization and you have no idea where their office is	Page 113
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	officers, you had no idea what I was talking about? Now, as your attorney says that you're a vice-president, you're telling me you're a vice-president? A. I thought you were talking about people other than me, sir. Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting? A. Five or six. Q. Who was there? A. I don't remember exactly who was there.	Page 111	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Gallagher, I usually call her by phone. Q. Well, how do you know they have an office? A. Because I know we have discussed that. Q. You've never been there, right? A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is? A. I don't know the address location. Q. You're a vice-president and director of the organization and you	Page 113

	Case 1.07-CV-00302 DOC				
1	A. I don't have it on me. I	Page 114	1	A. You know what, I don't know.	Page 116
2	can find it out for you. I have it at		2	I don't remember.	
3	home.		3	Q. Are there any other	
4	Q. But there's no employees who		4	directors?	
5	report there for business, right?		5	A. I don't remember.	
6	 A. No, there are no employees. 		6	Q. And how did you become a	
7	Q. And, in fact, none of the		7	director and vice-president? Maria	
8	members of the organization live in this		8	Gallagher said you're going to be a	
9	town, right?		9	director and vice-president?	
10	A. Maria Gallagher mostly has		10	A. No, no, no, but I've been	
11	only resided away from there for a brief		11	active in this organization, in terms of	
12	time this year and I think she's back		12	doing a lot of work.	
13	residing there again now.		13	Q. Well, I understand that.	
14	Q. Okay. And there's no		14	But before July or August of 2007, you	
15	business conducted in this office, is		15	weren't a director and vice-president,	
16	there?		16	right?	
17			17	A. That is correct.	
	A. Not right now.		ı		
18	Q. And there never has been,		18	Q. And when you went to this	
19	correct?		19	meeting with you and Maria Gallagher	
20	A. No, but there will be.		20	present, who said that Ms. Kramer's now	
21	Q. How long has the organization		21	a director and vice-president?	
22	had this office?		22	A. She asked me would I like to	
23	A. I think a short time.		23	and I said yes.	
24	Q. Well, what does that mean, a		24	Q. Ms. Gallagher did?	
25	week?		25	A. Yes.	
			-	······································	
		Page 115			Page 117
1	A. No, no, no, months.	Page 115	1	Q. So that's how you became	Page 117
1 2	A. No, no, months. Q. A couple months?	Page 115	1 2	Q. So that's how you became that title?	Page 117
		Page 115	1		Page 117
2 3	Q. A couple months?A. Yes.	Page 115	2	that title? A. Correct.	Page 117
2 3 4	Q. A couple months?A. Yes.Q. And how do they pay for the	Page 115	2 3 4	that title? A. Correct. Q. Anybody else who holds a	Page 117
2 3 4 5	Q. A couple months? A. Yes. Q. And how do they pay for the office?	Page 115	2 3 4 5	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you	Page 117
2 3 4 5 6	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know.	Page 115	2 3 4 5 6	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher?	Page 117
2 3 4 5 6 7	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and	Page 115	2 3 4 5 6 7	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but	Page 117
2 3 4 5 6 7 8	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your	Page 115	2 3 4 5 6 7 8	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now.	Page 117
2 3 4 5 6 7 8 9	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office?	Page 115	2 3 4 5 6 7 8 9	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization	Page 117
2 3 4 5 6 7 8 9	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's	Page 115	2 3 4 5 6 7 8 9	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated	Page 117
2 3 4 5 6 7 8 9 10 11	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from	Page 115	2 3 4 5 6 7 8 9 10	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere?	Page 117
2 3 4 5 6 7 8 9 10 11 12	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is	Page 115	2 3 4 5 6 7 8 9 10 11 12	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is.	Page 117
2 3 4 5 6 7 8 9 10 11 12 13	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this	Page 115	2 3 4 5 6 7 8 9 10 11 12 13	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where?	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida.	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was,	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated?	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fund-	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years.	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization.	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years. Q. Okay. And the documents	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fund-	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years.	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization.	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years. Q. Okay. And the documents	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization. Q. But the organization,	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years. Q. Okay. And the documents that show it's incorporated, those types	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization. Q. But the organization, Disabled Patriots, has no employee?	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years. Q. Okay. And the documents that show it's incorporated, those types of things?	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization. Q. But the organization, Disabled Patriots, has no employee? A. Right.	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years. Q. Okay. And the documents that show it's incorporated, those types of things? A. Hm-hm.	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization. Q. But the organization, Disabled Patriots, has no employee? A. Right. Q. It has at least two	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years. Q. Okay. And the documents that show it's incorporated, those types of things? A. Hm-hm. Q. Where are those documents	Page 117
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A couple months? A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization. Q. But the organization, Disabled Patriots, has no employee? A. Right. Q. It has at least two officers, you and Maria Gallagher?	Page 115	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years. Q. Okay. And the documents that show it's incorporated, those types of things? A. Hm-hm. Q. Where are those documents maintained?	Page 117

	Case 1:07-cv-06362 Docume	CIIL 13	J	Filed 03/06/2008 Page 11 of 24	
		age 118			Page 120
1	A. Yes, I'm sure.		1	Q. So you think there's by-laws	
2	Q. You don't know, do you?		2	but you've never seen them, right?	
3	 A. No, I'm fairly certain that 		3	A. Yes.	
4	they are maintained there.		4	Q. And you think they're	
5	Q. Has it ever been incorporated		5	incorporated but you've never seen those	
6	anywhere else besides Florida?		6	papers?	
7	A. I'm not certain.		7	A. Correct.	
8	Q. Is it in good standing to		8	Q. Okay. And the organization	
9	conduct business in the State of		9		
				has at least two officers, you and	
10	Florida?		10	Gallagher, right?	
11	A. Yes, it is.		11	A. Correct.	
12	Q. How do you know that?		12	Q. It has no employees?	
13	 A. Because I know it for a fact 		13	A. Correct.	
14	we had a meeting not very long ago, a	1	14	Q. And the only money it takes	
15	teleconference, which was a for the	1	15	in is if it's involved in a lawsuit or	
16	purposes of maintaining the legal status		16	a settlement and the monies from that?	
17	in Southern Florida.		17	A. Correct.	
18	Q. I don't understand. You had		18	Q. And who decides what	
19	a meeting to discuss whether you're		19	percentage of those monies the	
20	going to maintain legal status?		20	organization gets versus the attorneys,	
21			21	like Mr. Bacon or somebody else gets?	
	A. No, no, no, no. It was			· · · · · · · · · · · · · · · · · · ·	
22	a meeting to comply with what was		22	A. Well, the attorneys get paid	
23	requested by the articles of			whatever the agreement is.	
24	incorporation.		24	Q. The agreement between who?	
25	Q. There are articles of		25	A. Between the defendants and	
	<u> </u>				
	Pa	age 119			Page 121
1		age 119	1	the attorneys.	Page 121
1 2	incorporation? A. Yes.	age 119	1 2	•	Page 121
2	incorporation? A. Yes.	age 119	2	Q. So if the Disabled Patriots	Page 121
2 3	incorporation? A. Yes. Q. Is that yes?	age 119	2 3	Q. So if the Disabled Patriots has no say	Page 121
2 3 4	incorporation? A. Yes. Q. Is that yes? A. Yes.	age 119	2 3 4	Q. So if the Disabled Patriots has no say A. They work that out. No.	Page 121
2 3 4 5	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those	age 119	2 3 4 5	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes	Page 121
2 3 4 5 6	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained?	age 119	2 3 4 5 6	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys	Page 121
2 3 4 5 6 7	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher.	age 119	2 3 4 5 6 7	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No.	Page 121
2 3 4 5 6 7 8	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate	age 119	2 3 4 5 6 7 8	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them?	Page 121
2 3 4 5 6 7 8 9	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that?		2 3 4 5 6 7 8 9	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No.	Page 121
2 3 4 5 6 7 8 9 10	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes		2 3 4 5 6 7 8 9	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me?	Page 121
2 3 4 5 6 7 8 9 10 11	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings.		2 3 4 5 6 7 8 9 10 11	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No.	Page 121
2 3 4 5 6 7 8 9 10 11 12	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there		2 3 4 5 6 7 8 9 10 11 12	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you	Page 121
2 3 4 5 6 7 8 9 10 11	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings.		2 3 4 5 6 7 8 9 10 11	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there		2 3 4 5 6 7 8 9 10 11 12	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you	Page 121
2 3 4 5 6 7 8 9 10 11 12 13	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are?		2 3 4 5 6 7 8 9 10 11 12 13	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure		2 3 4 5 6 7 8 9 10 11 12 13 14	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them?		2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them? A. I saw her taking notes. I'm sure there are minutes.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the settlement, then that's what you get? A. It is not so random. I	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them? A. I saw her taking notes. I'm sure there are minutes. Q. No, I'm not asking just		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the settlement, then that's what you get? A. It is not so random. I think it has to do with reinspections of	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them? A. I saw her taking notes. I'm sure there are minutes. Q. No, I'm not asking just have you ever seen minutes from any of		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the settlement, then that's what you get? A. It is not so random. I think it has to do with reinspections of properties that have already been cited	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them? A. I saw her taking notes. I'm sure there are minutes. Q. No, I'm not asking just have you ever seen minutes from any of the meetings?		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the settlement, then that's what you get? A. It is not so random. I think it has to do with reinspections of properties that have already been cited and have gone through a legal process.	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them? A. I saw her taking notes. I'm sure there are minutes. Q. No, I'm not asking just have you ever seen minutes from any of the meetings? A. I have not.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the settlement, then that's what you get? A. It is not so random. I think it has to do with reinspections of properties that have already been cited and have gone through a legal process. Q. Is Mr. Bacon or the other	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them? A. I saw her taking notes. I'm sure there are minutes. Q. No, I'm not asking just have you ever seen minutes from any of the meetings? A. I have not. Q. Okay. So you're thinking		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the settlement, then that's what you get? A. It is not so random. I think it has to do with reinspections of properties that have already been cited and have gone through a legal process. Q. Is Mr. Bacon or the other attorneys from Illinois, are they	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them? A. I saw her taking notes. I'm sure there are minutes. Q. No, I'm not asking just have you ever seen minutes from any of the meetings? A. I have not. Q. Okay. So you're thinking that they exist is because you saw		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the settlement, then that's what you get? A. It is not so random. I think it has to do with reinspections of properties that have already been cited and have gone through a legal process. Q. Is Mr. Bacon or the other attorneys from Illinois, are they members of Disabled Patriots?	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them? A. I saw her taking notes. I'm sure there are minutes. Q. No, I'm not asking just have you ever seen minutes from any of the meetings? A. I have not. Q. Okay. So you're thinking that they exist is because you saw someone writing?		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the settlement, then that's what you get? A. It is not so random. I think it has to do with reinspections of properties that have already been cited and have gone through a legal process. Q. Is Mr. Bacon or the other attorneys from Illinois, are they members of Disabled Patriots? A. I don't know. No, I'm	Page 121
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher. Q. Is there like a corporate minute book, anything like that? A. I'm sure there are minutes of this last meeting or these meetings. Q. Well, do you know if there really are? A. Yes, I'm sure Q. Have you seen them? A. I saw her taking notes. I'm sure there are minutes. Q. No, I'm not asking just have you ever seen minutes from any of the meetings? A. I have not. Q. Okay. So you're thinking that they exist is because you saw		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No. Q versus goes to them? A. No. No. Q. Excuse me? A. No. Q. Well, then how is that you get money? It's just if Mr. Bacon hypothetically decides that the organization can get \$1,000 out of the settlement, then that's what you get? A. It is not so random. I think it has to do with reinspections of properties that have already been cited and have gone through a legal process. Q. Is Mr. Bacon or the other attorneys from Illinois, are they members of Disabled Patriots?	Page 12

			-5		
		Page 122			Page 124
1	 Q. Does Disabled Patriots pay 		1	A. That is correct.	
2	them anything?		2	Q. And in all these cases	
3	A. No. No, no, no, no.		3	you've been involved in, has a	
4	Q. Do they pay Disabled Patriots		4	settlement agreement ever provided for	
5	anything?		5	or the judgement ever provided for	
6	A. No.		6	Disabled Patriots to receive any money?	
7	Q. So the only one to get money		7	A. No.	
8	through these lawsuits but the attorneys		8	Q. Okay.	
9	don't give any of the money to your		9	A. Again, not to my awareness.	
10	organization?		10	Q. Okay. And does Disabled	
11	A. That is correct.		11	Patriots have any bank accounts?	
12	Q. Okay. So like in this suit		12	A. I think they have a bank	
13	that we're involved in now?		13	account, yes.	
14	A. Yes.		14	Q. Where is it located?	
15	Q. If money is recovered, who		15	A. In Southern Florida.	
16	gets it?		16	Q. You've never seen any	
17	A. If money is recovered, it's		17	documents showing the bank account?	
18	up to the attorneys. The attorneys get		18	A. I have not.	
19	it.		19	Q. And why do you think they	
20	Q. So you don't get anything?		20	have a bank account?	
21	A. No.		21	A. Because they do business,	
22	Q. You personally, the		22	some business. There's a phone bill	
23	organization, Disabled Patriots, would		23	being paid.	
24	get nothing?		24	Q. So you think the monies got	
25	A. Nothing.		25	to come from somewhere?	į
			2.5	Come non somewhere:	
		Page 123			Page 125
1	Q. Unless the attorneys decide	Page 123	1	A. Right.	Page 125
2	they wanted to give some money as a	Page 123	2	Q. Okay. Who would have access	Page 125
2 3	they wanted to give some money as a gift?	Page 123	l .	Q. Okay. Who would have access to that account?	Page 125
2 3 4	they wanted to give some money as a gift? A. Precisely.	Page 123	2 3 4	Q. Okay. Who would have access	Page 125
2 3 4 5	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no	Page 123	2 3 4 5	Q. Okay. Who would have access to that account?	Page 125
2 3 4	they wanted to give some money as a gift? A. Precisely.	Page 123	2 3 4	Q. Okay. Who would have access to that account? A. Maria Gallagher.	Page 125
2 3 4 5	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no	Page 123	2 3 4 5	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her?	Page 125
2 3 4 5 6	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or	Page 123	2 3 4 5 6	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my	Page 125
2 3 4 5 6 7	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled	Page 123	2 3 4 5 6 7	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes.	Page 125
2 3 4 5 6 7 8	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there?	Page 123	2 3 4 5 6 7 8	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled	Page 125
2 3 4 5 6 7 8 9	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct.	Page 123	2 3 4 5 6 7 8 9	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that.	Page 125
2 3 4 5 6 7 8 9	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an	Page 123	2 3 4 5 6 7 8 9	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any	Page 125
2 3 4 5 6 7 8 9 10 11	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the	Page 123	2 3 4 5 6 7 8 9 10 11	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've	Page 125
2 3 4 5 6 7 8 9 10 11 12	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right?	Page 123	2 3 4 5 6 7 8 9 10 11 12	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all?	Page 125
2 3 4 5 6 7 8 9 10 11 12 13	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled	Page 123	2 3 4 5 6 7 8 9 10 11 12 13	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties.	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any money?	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's possible that they might have some money	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any money? A. Not to my awareness.	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's possible that they might have some money in a bank account, right?	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any money? A. Not to my awareness. Q. Has Mr. Bacon or the lawyer	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's possible that they might have some money in a bank account, right? A. They might. Again, there	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any money? A. Not to my awareness. Q. Has Mr. Bacon or the lawyer in Illinois ever given or paid any money	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's possible that they might have some money in a bank account, right? A. They might. Again, there might have been some donations that I'm	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any money? A. Not to my awareness. Q. Has Mr. Bacon or the lawyer in Illinois ever given or paid any money to your organization?	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's possible that they might have some money in a bank account, right? A. They might. Again, there might have been some donations that I'm not aware of.	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any money? A. Not to my awareness. Q. Has Mr. Bacon or the lawyer in Illinois ever given or paid any money to your organization? A. Not to my awareness.	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's possible that they might have some money in a bank account, right? A. They might. Again, there might have been some donations that I'm not aware of. Q. Okay. But you don't have	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any money? A. Not to my awareness. Q. Has Mr. Bacon or the lawyer in Illinois ever given or paid any money to your organization? A. Not to my awareness. Q. So all these suits you've	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's possible that they might have some money in a bank account, right? A. They might. Again, there might have been some donations that I'm not aware of. Q. Okay. But you don't have any knowledge that they have any assets	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any money? A. Not to my awareness. Q. Has Mr. Bacon or the lawyer in Illinois ever given or paid any money to your organization? A. Not to my awareness. Q. So all these suits you've been involved in, they've never given a	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's possible that they might have some money in a bank account, right? A. They might. Again, there might have been some donations that I'm not aware of. Q. Okay. But you don't have any knowledge that they have any assets at all, do you, ma'am?	Page 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	they wanted to give some money as a gift? A. Precisely. Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever paid an attorney any money? A. Not to my awareness. Q. Has Mr. Bacon or the lawyer in Illinois ever given or paid any money to your organization? A. Not to my awareness. Q. So all these suits you've	Page 123	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay. Who would have access to that account? A. Maria Gallagher. Q. Only her? A. Yes. As the best of my knowledge, yes. Q. Okay. And does Disabled Patriots besides well, strike that. Does Disabled Patriots have any assets at all? A. Not beyond what I've described which is reinspection fees on properties. Q. Well, according to you, it's possible that they might have some money in a bank account, right? A. They might. Again, there might have been some donations that I'm not aware of. Q. Okay. But you don't have any knowledge that they have any assets	Page 125

	Case 1.07-cv-00302 D000			Filed 03/00/2006 Fage 13 01 24	
		Page 126			Page 128
1	sitting here under oath today, you're		1	A. I can't I don't know.	
2	not aware of anything that Disabled		2	Q. Okay. Who is it that	
3	Patriots possesses or owns, correct?		3	decided that Mr. Bacon and the attorney	
4	A. That is correct.		4	in Illinois should be the lawyers for	
5	Q. Does the organization even		5	Disabled Patriots in this case?	
6	own a cell phone or anything like that?		6	A. I don't know.	
7	A. They have a phone. I know		7	Q. You have no idea?	
8	they do.		8	A. Um-um.	
9					
	Q. Well, is it just a phone		9	Q. Is that a no?	
10	that happens be in the office or is it		10	A. No. I know I've worked with	
11	a cell phone?		11	Mr. Bacon a few times and	
12	A. No, it's a phone in the		12	Q. Well, ma'am, you're the	
13	office.		13	plaintiff in this case, you understand	
14	Q. So they don't own that,		14	that, right?	
15	that's just part of the rental		15	A. Yes.	
16	agreement?		16	Q. Okay. And Mr. Bacon, he	
17	A. I don't know.		17	doesn't represent you personally, does	
18	Q. Okay. Is there any		18	he?	
19	furniture, desk, anything at all in this		19	A. No.	
20	office space you've been talking about?		20	Q. He just represents Disabled	
21	A. Well, it's not an empty		21	Patriots?	
22	· · · · · · · · · · · · · · · · · · ·		22		
	space so and I can't tell what's in		l	A. Yes, but he	
23	the space. I've never seen it.		23	Q. Who at Disabled Patriots	
24	Q. You've never been there?		24	5 ,	
25	A. Not yet.		25	be their attorneys for this case?	
		Page 12/	ļ		Page 129
1	O. And no one's ever described	Page 127	1	A. I don't know how the	Page 129
1 2	Q. And no one's ever described it to you?	Page 12/	1 2	A. I don't know how the	Page 129
2	it to you?	Page 127	2	decisions are made.	Page 129
2 3	it to you? A. No.	Page 127	2	decisions are made. Q. So is it correct that what	Page 129
2 3 4	it to you? A. No. Q. Okay. So I'm trying to	Page 127	2 3 4	decisions are made. Q. So is it correct that what happened was someone just sent you a	Page 129
2 3 4 5	it to you? A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a	Page 12/	2 3 4 5	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed	Page 129
2 3 4 5 6	it to you? A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no	Page 12/	2 3 4 5 6	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed?	Page 129
2 3 4 5 6 7	it to you? A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from	Page 12/	2 3 4 5 6 7	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off	Page 129
2 3 4 5 6 7 8	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So	Page 12/	2 3 4 5 6 7 8	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed.	Page 129
2 3 4 5 6 7 8 9	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I	Page 12/	2 3 4 5 6 7 8 9	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you	Page 129
2 3 4 5 6 7 8 9	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand.	Page 12/	2 3 4 5 6 7 8 9	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was	Page 129
2 3 4 5 6 7 8 9	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I	Page 12/	2 3 4 5 6 7 8 9	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you	Page 129
2 3 4 5 6 7 8 9	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand.	Page 12/	2 3 4 5 6 7 8 9	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was	Page 129
2 3 4 5 6 7 8 9 10	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on	Page 12/	2 3 4 5 6 7 8 9 10	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing?	Page 129
2 3 4 5 6 7 8 9 10 11 12 13	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced.	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations.	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function.	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case?	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago.	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case? A. That's right.	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago. A. Okay.	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case? A. That's right. Q. Well, why do we need them?	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago. A. Okay. Q. How did you find out that	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case? A. That's right. Q. Well, why do we need them? We have you who is the plaintiff. Why	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago. A. Okay. Q. How did you find out that Mr. Bacon was going to be an attorney	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case? A. That's right. Q. Well, why do we need them? We have you who is the plaintiff. Why do we also need them? I don't	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago. A. Okay. Q. How did you find out that Mr. Bacon was going to be an attorney in this case?	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case? A. That's right. Q. Well, why do we need them? We have you who is the plaintiff. Why do we also need them? I don't understand what they add to the case.	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago. A. Okay. Q. How did you find out that Mr. Bacon was going to be an attorney in this case? A. I know that we have worked	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case? A. That's right. Q. Well, why do we need them? We have you who is the plaintiff. Why do we also need them? I don't understand what they add to the case. A. Talk to Mr. Bacon. That's	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago. A. Okay. Q. How did you find out that Mr. Bacon was going to be an attorney in this case?	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case? A. That's right. Q. Well, why do we need them? We have you who is the plaintiff. Why do we also need them? I don't understand what they add to the case.	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago. A. Okay. Q. How did you find out that Mr. Bacon was going to be an attorney in this case? A. I know that we have worked	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case? A. That's right. Q. Well, why do we need them? We have you who is the plaintiff. Why do we also need them? I don't understand what they add to the case. A. Talk to Mr. Bacon. That's	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago. A. Okay. Q. How did you find out that Mr. Bacon was going to be an attorney in this case? A. I know that we have worked with Tom. I've worked with Tom on	Page 129
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. Okay. So I'm trying to understand why Disabled Patriots is a party to this case. They have no entitlement to any of the monies from this case, they have no assets. So what is it they bring to this case? I don't understand. A. Well, again, this is a little organization that is working on making sure that the ADA is enforced. That's the entire function. Q. That's why they're a party to this case? A. That's right. Q. Well, why do we need them? We have you who is the plaintiff. Why do we also need them? I don't understand what they add to the case. A. Talk to Mr. Bacon. That's stuff I don't know about.	Page 12/	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	decisions are made. Q. So is it correct that what happened was someone just sent you a copy of this lawsuit after it was filed and said that it had been filed? A. Well, no, because I sign off before they're filed. Q. Okay. So someone sent you how did you know that Mr. Bacon was even going to be involved in this thing? A. Perhaps through conversations. Q. Well, I don't want a perhaps. I want to know this is a very short time ago. A. Okay. Q. How did you find out that Mr. Bacon was going to be an attorney in this case? A. I know that we have worked with Tom. I've worked with Tom on other cases and I know that he is one	Page 129

	Case 1:07-cv-06362 Doc		-5	Filed 03/06/2008 Page 14 of 24	
		Page 130			Page 132
1	Q. But you didn't have ask him		1	A. Yes.	
2	to file the suit, did you?		2	Q. You didn't ask anyone to put	
3	A. Personally, no.		3	that together, did you?	
4	Q. You didn't ask him to draft		4	A. I know that it was a list of	
5	a complaint, did you, ma'am?		5	a list of places that we saw in	
6	A. Personally, no.		6	Chicago that were substandard.	
7	Q. Do you know who did?		7	Q. I understand that. But you	
8	A. I assume Disabled Patriots		8	didn't ask anyone to draft a lawsuit,	
9	which means Maria.		9	did you?	
10	Q. But you don't know that?		10	A. No.	
11	A. I'm assuming.		11		
12			ı	Q. Okay. So you get this in	
	Q. Okay. But you don't know		12	the mail and it's sort of out of the	
13	that for sure, do you?		13	blue, right?	
14	A. No.		14	A. No, because I know we're	
15	Q. Okay. And how would Maria		15	always working on cases.	
16	have known that a lawsuit should be put		16	Q. Well, yeah, you're not	
17	together?		17	surprised that someone sent you a	
18	 A. Because we talk about what 		18	lawsuit but no one had told you you	
19	we're seeing out in the field all the		19	were going to receive this, right?	
20	time.		20	A. No, this is what I do.	
21	Q. Okay. So you talked to		21	Q. Okay. And so then you	
22	Maria about this incident in Illinois		22	looked at the complaint. Did you review	
23	when?		23	it for accuracy?	
24	A. I'm sure when I returned.		24	A. Absolutely.	
25	Q. Okay. Do you remember		25	Q. And then you didn't make any	
1	talking to her about it?	Page 131	1	changes did you?	Page 133
1	talking to her about it?	Page 131	1	changes, did you?	Page 133
2	A. Sure.	Page 131	2	A. No.	Page 133
2	A. Sure. Q. What did you tell her?	Page 131	2 3	A. No. Q. And it looks an awful lot	Page 133
2 3 4	A. Sure.Q. What did you tell her?A. I talked to her about the	Page 131	2 3 4	A. No.Q. And it looks an awful lot like a lot of the suits you filed,	Page 133
2 3 4 5	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a	Page 131	2 3 4 5	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right?	Page 133
2 3 4 5 6	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling.	Page 131	2 3 4 5 6	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct.	Page 133
2 3 4 5 6 7	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her	Page 131	2 3 4 5 6 7	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact	Page 133
2 3 4 5 6 7 8	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall?	Page 131	2 3 4 5 6 7 8	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other	Page 133
2 3 4 5 6 7 8 9	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did.	Page 131	2 3 4 5 6 7 8 9	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it?	Page 133
2 3 4 5 6 7 8 9	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next	Page 131	2 3 4 5 6 7 8 9	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct.	Page 133
2 3 4 5 6 7 8 9 10 11	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent	Page 131	2 3 4 5 6 7 8 9	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it?	Page 133
2 3 4 5 6 7 8 9	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next	Page 131	2 3 4 5 6 7 8 9	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct.	Page 133
2 3 4 5 6 7 8 9 10 11	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint	Page 131	2 3 4 5 6 7 8 9 10	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every	Page 133
2 3 4 5 6 7 8 9 10 11 12 13	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent	Page 131	2 3 4 5 6 7 8 9 10 11 12 13	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am?	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct.	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not.	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town &	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you never talk to him again, then you talk	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the violations that you actually saw in	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you never talk to him again, then you talk to Maria about this Town & Country, and	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the violations that you actually saw in Illinois?	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you never talk to him again, then you talk to Maria about this Town & Country, and you never talk to her about it again,	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the violations that you actually saw in Illinois? A. Because I don't think I was	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you never talk to him again, then you talk to Maria about this Town & Country, and you never talk to her about it again, right?	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the violations that you actually saw in Illinois? A. Because I don't think I was being asked that at that time.	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you never talk to him again, then you talk to Maria about this Town & Country, and you never talk to her about it again, right? A. Correct, I think	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the violations that you actually saw in Illinois? A. Because I don't think I was being asked that at that time. Q. Well, what did you think	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you never talk to him again, then you talk to Maria about this Town & Country, and you never talk to her about it again, right? A. Correct, I think Q. And then one day you get in	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the violations that you actually saw in Illinois? A. Because I don't think I was being asked that at that time. Q. Well, what did you think your purpose was in reviewing this	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you never talk to him again, then you talk to Maria about this Town & Country, and you never talk to her about it again, right? A. Correct, I think Q. And then one day you get in the mail at your house a copy of a	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the violations that you actually saw in Illinois? A. Because I don't think I was being asked that at that time. Q. Well, what did you think your purpose was in reviewing this complaint, ma'am?	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you never talk to him again, then you talk to Maria about this Town & Country, and you never talk to her about it again, right? A. Correct, I think Q. And then one day you get in the mail at your house a copy of a lawsuit that's in your name and in	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the violations that you actually saw in Illinois? A. Because I don't think I was being asked that at that time. Q. Well, what did you think your purpose was in reviewing this	Page 133
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling. Q. And you specifically told her about Town & Country Mall? A. I did. Q. Okay. And then the next thing that happened is, Mr. Bacon sent you in the mail a copy of a complaint to review; is that right? A. Correct. Q. So you go into Town & Country, you talk to Pedraza once, you never talk to him again, then you talk to Maria about this Town & Country, and you never talk to her about it again, right? A. Correct, I think Q. And then one day you get in the mail at your house a copy of a	Page 131	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct. Q. It actually has the exact same language as almost all of the other lawsuits, doesn't it? A. Correct. Q. And I don't understand, how can the violations be the same in every place? They're not, are they, ma'am? A. No, they're definitely not. Q. So why didn't you make changes to more accurately reflect the violations that you actually saw in Illinois? A. Because I don't think I was being asked that at that time. Q. Well, what did you think your purpose was in reviewing this complaint, ma'am?	Page 133

		umem 19			
1	there was nothing erroneous in the	Page 134	1	A. I don't know.	Page 136
2	report or the complaint.		2		
3	Q. A lot of the things in the		3	Q. But you told me earlier that	
4	complaint, ma'am, are things you never		4	he never told you he had ever been	
	• • • • • • • • • • • • • • • • • • • •			there, right?	
5	saw at Town & Country, right?		5	A. We never talked about it but	
6	A. I don't know what you're		6	it's just in the cycle of how things	
7	talking about.		7	are done. I tell people what I see.	
8	Q. Well, there's all sorts of		8	If Dave thinks that there's enough merit	
9	allegations in your complaint, and		9	on what I'm telling him, he goes out	
10	there's things that you never personally		10	and takes a look.	
11	observed in Illinois, are they, ma'am?		11	Q. I understand that's how it	
12	A. Like what?		12	usually works. But in this particular	
13	Q. Well, you just listed for		13	suit, you had no knowledge that David	
14	all me all the violations that you were		14	had ever actually been there because he	
15	aware of, right?		15	never told you he had been there, right?	
16	A. Hm-hm.		16	A. That is correct but there's	
17	Q. We went through that in		17	no lawsuit without an expert taking a	
18	detail, didn't we?		18	look.	
19	A. I told you as best as I		19	Q. Well, there shouldn't be.	
20	could remember.		20	A. Well, there isn't	
21	Q. Correct. But the thing that		21	Q. You didn't know Pedraza had	
22	was sent to you in the mail out of the		22		
23	blue by Mr. Bacon's office it contained		23	A. There is no never a	
24	a lot of other violations that you never		24		
25	even saw, right?		25		
	even saw, right:		23	taking a look.	
		Page 135			Page 137
1	 A. But what I'm telling you is 		1	Q. Ma'am, with regard to this	
2	that if I find a lot of violations		2	lawsuit we're here for today	
3	personally, it's enough to get somebody		3	A. Okay.	
4	out there to take another look.		4	Q nobody ever told you that	
5	Q. Before you signed off on				
6			5	Pedraza or anybody else had ever been	
_	this lawsuit going forward, you had no		5 6	Pedraza or anybody else had ever been there before you signed off on them	
7	this lawsuit going forward, you had no idea that anyone had ever taken another			there before you signed off on them	
7 8			6		
1	idea that anyone had ever taken another		6 7	there before you signed off on them suing this company, right?	
8 9	idea that anyone had ever taken another look, right? A. I always know that someone's		6 7 8	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago.	
8 9 10	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not		6 7 8 9 10	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not	
8 9 10 11	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look		6 7 8 9 10 11	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have	
8 9 10 11 12	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off		6 7 8 9 10 11 12	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened.	
8 9 10 11 12 13	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit?		6 7 8 9 10 11 12 13	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you.	
8 9 10 11 12 13 14	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20		6 7 8 9 10 11 12 13 14	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this	
8 9 10 11 12 13 14 15	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a		6 7 8 9 10 11 12 13 14 15	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you	
8 9 10 11 12 13 14 15 16	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir.		6 7 8 9 10 11 12 13 14 15 16	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever	
8 9 10 11 12 13 14 15 16 17	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir. Q. Well, ma'am, I'm asking you.		6 7 8 9 10 11 12 13 14 15 16 17	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever been back to Town & Country, right?	
8 9 10 11 12 13 14 15 16 17 18	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir. Q. Well, ma'am, I'm asking you. You're the plaintiff in this case. Who		6 7 8 9 10 11 12 13 14 15 16 17 18	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever been back to Town & Country, right? A. I knew that Pedraza had gone	
8 9 10 11 12 13 14 15 16 17 18 19	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir. Q. Well, ma'am, I'm asking you. You're the plaintiff in this case. Who went out there to your knowledge to		6 7 8 9 10 11 12 13 14 15 16 17 18 19	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever been back to Town & Country, right? A. I knew that Pedraza had gone to the greater the Chicago land area	
8 9 10 11 12 13 14 15 16 17 18 19 20	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir. Q. Well, ma'am, I'm asking you. You're the plaintiff in this case. Who went out there to your knowledge to verify these things in the complaint		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever been back to Town & Country, right? A. I knew that Pedraza had gone to the greater the Chicago land area to look at all the things I mentioned.	
8 9 10 11 12 13 14 15 16 17 18 19 20 21	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir. Q. Well, ma'am, I'm asking you. You're the plaintiff in this case. Who went out there to your knowledge to verify these things in the complaint actually exist?		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever been back to Town & Country, right? A. I knew that Pedraza had gone to the greater the Chicago land area to look at all the things I mentioned. Q. Listen to my specific	
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir. Q. Well, ma'am, I'm asking you. You're the plaintiff in this case. Who went out there to your knowledge to verify these things in the complaint actually exist? A. The expert, David Pedraza.		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever been back to Town & Country, right? A. I knew that Pedraza had gone to the greater the Chicago land area to look at all the things I mentioned. Q. Listen to my specific question.	
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir. Q. Well, ma'am, I'm asking you. You're the plaintiff in this case. Who went out there to your knowledge to verify these things in the complaint actually exist? A. The expert, David Pedraza. Q. So he was there?		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever been back to Town & Country, right? A. I knew that Pedraza had gone to the greater the Chicago land area to look at all the things I mentioned. Q. Listen to my specific question. A. Okay.	
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir. Q. Well, ma'am, I'm asking you. You're the plaintiff in this case. Who went out there to your knowledge to verify these things in the complaint actually exist? A. The expert, David Pedraza. Q. So he was there? A. Yes.		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever been back to Town & Country, right? A. I knew that Pedraza had gone to the greater the Chicago land area to look at all the things I mentioned. Q. Listen to my specific question. A. Okay. Q. Before you signed off on	
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	idea that anyone had ever taken another look, right? A. I always know that someone's taking another look. It's not Q. Well, who took another look at this case and before you signed off on the suit? A. It's not on my 20 photographs that we decide to file a lawsuit, sir. Q. Well, ma'am, I'm asking you. You're the plaintiff in this case. Who went out there to your knowledge to verify these things in the complaint actually exist? A. The expert, David Pedraza. Q. So he was there?		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	there before you signed off on them suing this company, right? A. I knew Dave looked at all stuff in Chicago. Q. Wait, wait, ma'am, I'm not asking what you think might have happened. A. No, I'm telling you. Q. Before you filed this particular lawsuit, nobody ever told you that Pedraza or anyone else had ever been back to Town & Country, right? A. I knew that Pedraza had gone to the greater the Chicago land area to look at all the things I mentioned. Q. Listen to my specific question. A. Okay.	

	Case 1:07-cv-06362 Docu	ment 19	-5	Filed 03/06/2008 Page 16 of 24	
		Page 138			Page 140
1	nobody ever told you specifically that		1	Q. Okay. And we talked about	
2	Pedraza had ever been or anyone else had		2	Maria Gallagher. Do you have her	
3	ever been to Town & Country, right?		3	address or contact information?	
4	A. Right.		4	A. I have a phone number.	
5	Q. Okay. Now, in this suit,		5	Q. What's that?	
6	ma'am, if you do prevail, do you get		6	A. Hold on. Also, I'm going to	
7	anything from it yourself, other than		7	need a break to get some water and go	
8	the satisfaction of knowing that things		8	the bathroom. One second.	
9	might be corrected?		9	MR. BACON: Michael, what do you	
10			10	· · · · · · · · · · · · · · · · · · ·	
	A. Nothing.			want to do? Do you want to take a ten	
11	Q. You get nothing out of it,		11	minute break or something?	
12	right?		12	MR. LEONARD: Do you want to	
13	A. Nothing.		13	take ten?	
14	Q. You have no interest, right?		14	MR. BACON: How do you want to	
15	A. Nothing.		15	do this, as far as the telephone calls	
16	Q. And likewise, Disabled		16	are concerned? Should we just leave the	
17	Patriots, if you prevail, likewise other		17	lines open?	
18	than getting satisfaction, gets nothing		18	MR. LEONARD: Yeah, just leave it	
19	out of it either, right?		19	open.	
20	A. That is correct.		20	MR. BACON: Ten minutes.	
21	Q. Okay. Who were the other		21	(Recess taken.)	
22	members of Disabled Patriots besides		22	· · · · · · · · · · · · · · · · · · ·	
				Q. Ready to proceed?	
23	yourself and Ms. Gallagher?		23	A. Yes.	
24	A. I haven't met them but there		24	Q. You understand you're back on	
25	are people that work all over the East		25	the record and under oath, ma'am?	
		Page 139			Page 141
1	Coast.		1	A. Yes.	
	O Put can you identify for ma		_	Q. When we took a break	
2	 Q. But can you identify for me, 		2	Q. When we took a break	
3	ma'am, as the vice-president and		3	first of all, you were going to get me	
	ma'am, as the vice-president and			first of all, you were going to get me	
3 4	ma'am, as the vice-president and director of Disabled Patriots, the		3 4	first of all, you were going to get me you did get me Maria Gallagher's	
3 4 5	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides		3 4 5	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct?	
3 4 5 6	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher?		3 4 5 6	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here.	
3 4 5 6 7	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named		3 4 5 6 7	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that?	
3 4 5 6 7 8	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's		3 4 5 6 7 8	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561.	
3 4 5 6 7 8 9	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus?		3 4 5 6 7 8 9	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay.	
3 4 5 6 7 8 9	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active.		3 4 5 6 7 8 9	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452.	
3 4 5 6 7 8 9 10	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name?		3 4 5 6 7 8 9 10	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay.	
3 4 5 6 7 8 9 10 11 12	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know.		3 4 5 6 7 8 9 10 11 12	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155.	
3 4 5 6 7 8 9 10 11 12 13	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name?		3 4 5 6 7 8 9 10 11 12 13	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155?	
3 4 5 6 7 8 9 10 11 12	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know.		3 4 5 6 7 8 9 10 11 12 13 14	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct.	
3 4 5 6 7 8 9 10 11 12 13	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where		3 4 5 6 7 8 9 10 11 12 13	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155?	
3 4 5 6 7 8 9 10 11 12 13 14	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives?		3 4 5 6 7 8 9 10 11 12 13 14	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct.	
3 4 5 6 7 8 9 10 11 12 13 14 15 16	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta.		3 4 5 6 7 8 9 10 11 12 13 14 15 16	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta. Q. Okay. Have you ever spoken to him?		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms.	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta. Q. Okay. Have you ever spoken to him? A. No.		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms. Gallagher. How long has she been a	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta. Q. Okay. Have you ever spoken to him? A. No. Q. Is he disabled?		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms. Gallagher. How long has she been a member?	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta. Q. Okay. Have you ever spoken to him? A. No. Q. Is he disabled? A. Yes.		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms. Gallagher. How long has she been a member? A. From the beginning.	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta. Q. Okay. Have you ever spoken to him? A. No. Q. Is he disabled? A. Yes. Q. Okay. What's his disability?		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms. Gallagher. How long has she been a member? A. From the beginning. Q. You don't know of any	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta. Q. Okay. Have you ever spoken to him? A. No. Q. Is he disabled? A. Yes. Q. Okay. What's his disability? A. I believe he's in a		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms. Gallagher. How long has she been a member? A. From the beginning. Q. You don't know of any records that show how long she's been a	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta. Q. Okay. Have you ever spoken to him? A. No. Q. Is he disabled? A. Yes. Q. Okay. What's his disability? A. I believe he's in a wheelchair.		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms. Gallagher. How long has she been a member? A. From the beginning. Q. You don't know of any records that show how long she's been a member, though, right?	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta. Q. Okay. Have you ever spoken to him? A. No. Q. Is he disabled? A. Yes. Q. Okay. What's his disability? A. I believe he's in a wheelchair. Q. Have you ever seen him?		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms. Gallagher. How long has she been a member? A. From the beginning. Q. You don't know of any records that show how long she's been a member, though, right? A. Yeah, but I know that there	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher? A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus? A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives? A. Atlanta. Q. Okay. Have you ever spoken to him? A. No. Q. Is he disabled? A. Yes. Q. Okay. What's his disability? A. I believe he's in a wheelchair.		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms. Gallagher. How long has she been a member? A. From the beginning. Q. You don't know of any records that show how long she's been a member, though, right?	

	Case 1:07-cv-06362 D00	cument 19	1- 5	Filed 03/06/2008 Page 17 of 24	
		Page 142			Page 144
1	Q. You've never seen them?		1	A. He lives in Avon Lake, Ohio.	
2	A. No.		2	Q. Okay. What's his address?	
3	Q. This individual Marcus who		3	A. I don't remember offhand.	
4	lives in Atlanta, you don't know his		4	It's on Lear Road in Avon Lake?	
5	last name?		5		
6	A. I don't.			Q. How do you spell the name of	
			6	the road?	
7	Q. And you don't know his phone		7	A. LEAR.	
8	number?		8	Q. And Avon Lake, and that's	
9	A. No.		9	outside of Cleveland?	
10	Q. And you don't know his		10	A. It is. It's a suburb.	
11	address?		11	Q. Do you have his phone	
12	A. I don't.		12	number?	
13	Q. And you've never met him?		13	A. I don't.	
14	A. No.		14	Q. Do you have his e-mail	
15	Q. Have you ever spoken to him?		15	address?	
16	A. No.		16	A. At home.	
17	Q. And how do you know he's a		17	Q. Do you have Marcus' phone	
18	member?		18		
19				number or e-mail address at home?	
ı	A. Because I've been told and I		19	A. I do not.	
20	heard him referenced numerous times.		20	Q. Okay. Mr. Greiner, how long	
21	Q. Okay. And your understanding		21	have you known him?	
22	is that he uses a wheelchair?		22	 A. Three or four years. 	
23	A. Yes, I know he does.		23	Q. How do you know he's a	
24	Q. You've never seen him use a		24	member?	
25	wheelchair, have you?		25	A. Because he filled out an	
		Page 143			Page 145
1	A. No.	. 5	1	application and I think it was in my	
2	Q. And you know nothing about		2	presence.	
3	his alleged disability, do you, ma'am?		3	Q. Okay. And you say he uses a	
4	A. I do not.		4	wheelchair?	
5			l		
	Q. Okay. Can you identify any		5	A. Yes.	
6	other members for me?		6	Q. And how long has he used a	
7	A. I can't.		7	wheelchair?	
8	Q. None?		8	A. He is now 28 years old.	
9	A. I know that there are other		9	He's used it since he was 16.	
10	members. I'm just kind of drawing a			O The same street become 462	
			10	Q. I'm sorry, since he was 16?	
11	blank.		10	A. Yes.	
11 12			l	- · · · · · · · · · · · · · · · · · · ·	
	blank. Q. Well, you're the		11	A. Yes. Q. What's the nature of his	
12	blank. Q. Well, you're the vice-president and a director of the		11 12 13	A. Yes. Q. What's the nature of his disability?	
12 13 14	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for		11 12 13 14	A. Yes. Q. What's the nature of his disability? A. He had an accident.	
12 13 14 15	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct?		11 12 13 14 15	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident?	
12 13 14 15 16	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a		11 12 13 14 15 16	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trick	
12 13 14 15 16 17	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a friend here that's a member that's in a		11 12 13 14 15 16 17	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trickdoing BMX bicycle trick riding.	
12 13 14 15 16 17 18	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a friend here that's a member that's in a wheelchair.		11 12 13 14 15 16 17 18	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trick doing BMX bicycle trick riding. Q. Okay.	
12 13 14 15 16 17 18 19	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a friend here that's a member that's in a wheelchair. Q. Who's that?		11 12 13 14 15 16 17 18 19	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trick doing BMX bicycle trick riding. Q. Okay. A. And snapped his	
12 13 14 15 16 17 18 19 20	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a friend here that's a member that's in a wheelchair. Q. Who's that? A. His name is John Greiner.		11 12 13 14 15 16 17 18 19 20	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trickdoing BMX bicycle trick riding. Q. Okay. A. And snapped his Q. Is he paralyzed?	
12 13 14 15 16 17 18 19 20 21	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a friend here that's a member that's in a wheelchair. Q. Who's that? A. His name is John Greiner. Q. How do you spell the last		11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trickdoing BMX bicycle trick riding. Q. Okay. A. And snapped his Q. Is he paralyzed? A. Yes, he is.	
12 13 14 15 16 17 18 19 20 21 22	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a friend here that's a member that's in a wheelchair. Q. Who's that? A. His name is John Greiner. Q. How do you spell the last name?		11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trickdoing BMX bicycle trick riding. Q. Okay. A. And snapped his Q. Is he paralyzed?	
12 13 14 15 16 17 18 19 20 21	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a friend here that's a member that's in a wheelchair. Q. Who's that? A. His name is John Greiner. Q. How do you spell the last	·	11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trickdoing BMX bicycle trick riding. Q. Okay. A. And snapped his Q. Is he paralyzed? A. Yes, he is.	
12 13 14 15 16 17 18 19 20 21 22	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a friend here that's a member that's in a wheelchair. Q. Who's that? A. His name is John Greiner. Q. How do you spell the last name?		11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trick doing BMX bicycle trick riding. Q. Okay. A. And snapped his Q. Is he paralyzed? A. Yes, he is. Q. Okay. Any other members or	
12 13 14 15 16 17 18 19 20 21 22 23	blank. Q. Well, you're the vice-president and a director of the organization and you can't identify for me a single additional member, correct? A. Correct. I know I have a friend here that's a member that's in a wheelchair. Q. Who's that? A. His name is John Greiner. Q. How do you spell the last name? A. G R E I N E R.		11 12 13 14 15 16 17 18 19 20 21 22 23	A. Yes. Q. What's the nature of his disability? A. He had an accident. Q. Car accident? A. No, a bike riding trick doing BMX bicycle trick riding. Q. Okay. A. And snapped his Q. Is he paralyzed? A. Yes, he is. Q. Okay. Any other members or people who you think are members besides	

_	Case 1:07-cv-06362 Docu	ment 19	-5	Filed 03/06/2008 Page 18 of 24	
		Page 146			Page 148
1	A. No, but I know there are		1	A. Not that I participated in.	=
2	others.		2	Q. Well, was there ever one	
3	Q. How do you know that?		3	before that you know of?	
4	 A. Because we talked about them. 		4	A. I don't know.	
5	Their names were mentioned.		5	Q. Okay. And why was this	
6	Q. When?		6	particular meeting called? You said	
7	 A. At this meeting in 		7	there was some concern about following	
8	Pittsburgh.		8	the corporate formalities. How did that	
9	Q. So someone has told you over		9	come to Disabled Patriots' attention?	
10	the years that there might be as many		10	A. I don't know. I just know	
11	as 20 members but you can't identify any		11	that there are policies and procedures	
12	of them?		12	that are necessary to maintain our	
13	A. I can't, yeah, except for		13	incorporation status in good standing.	
14	Q. How would I find out their		14	Q. Who were the participants in	
15	identities		15	this telephone conference?	
16	A. You would ask		16	A. Maria Gallagher and I'm	
17	Q that they exist?		17	trying to recall who else was present.	
18	A. You would ask Maria		18	Again, it was a teleconference.	
19	Gallagher.		19	Q. You don't know?	
20	Q. Okay. I'm sorry, I think		20	A. Um-um.	
21	you already told me this and I		21	Q. Is that a no?	
22	apologize, if I asked. John Greiner,		22	A. No.	
23	you know he's a member because you saw		23	Q. And you've never seen any	
24	him filling out an application?		24	minutes from the meeting?	
25	A. Yes.		25	A. I have not.	
		Dago 1/17			Dago 140
i	O. Do you know if he ever sent	Page 147	1	O Were you physically in the	Page 149
1 2	Q. Do you know if he ever sent it in?	Page 147	1 2	Q. Were you physically in the	Page 149
2	it in?	Page 147	2	same room as Maria Gallagher?	Page 149
2	it in? A. I'm sure he did.	Page 147	2	same room as Maria Gallagher? A. No, it was a teleconference.	Page 149
2 3 4	it in? A. I'm sure he did. Q. You just don't know one way	Page 147	2 3 4	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone.	Page 149
2 3 4 5	it in? A. I'm sure he did. Q. You just don't know one way or the other?	Page 147	2 3 4 5	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier	Page 149
2 3 4 5 6	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did.	Page 147	2 3 4	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or	Page 149
2 3 4 5 6 7	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would	Page 147	2 3 4 5 6 7	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether	Page 149
2 3 4 5 6 7 8	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have?	Page 147	2 3 4 5 6 7 8	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes?	Page 149
2 3 4 5 6 7 8 9	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did.	Page 147	2 3 4 5 6 7 8 9	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her	Page 149
2 3 4 5 6 7 8 9	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay.	Page 147	2 3 4 5 6 7 8 9	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were	Page 149
2 3 4 5 6 7 8 9 10	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was	Page 147	2 3 4 5 6 7 8 9 10	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting.	Page 149
2 3 4 5 6 7 8 9 10 11	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting.	Page 147	2 3 4 5 6 7 8 9 10 11 12	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place,	Page 149
2 3 4 5 6 7 8 9 10 11 12 13	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who	Page 147	2 3 4 5 6 7 8 9 10 11 12 13	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month?	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them?	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry?	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them? A. No.	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry? Q. The annual meeting that was	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them? A. No. Q. And is there any way that	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that?	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them? A. No. Q. And is there any way that the group conducts business? For	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that? A. Yes, that was in the autumn,	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them? A. No. Q. And is there any way that the group conducts business? For instance, are there is there an	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that? A. Yes, that was in the autumn, also.	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them? A. No. Q. And is there any way that the group conducts business? For instance, are there is there an annual meeting? How does the group	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that? A. Yes, that was in the autumn, also. Q. Of 07?	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them? A. No. Q. And is there any way that the group conducts business? For instance, are there is there an annual meeting? How does the group conduct its business?	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that? A. Yes, that was in the autumn, also. Q. Of 07? A. Yes. No yes, the autumn	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them? A. No. Q. And is there any way that the group conducts business? For instance, are there is there an annual meeting? How does the group conduct its business? A. There was recently an annual	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that? A. Yes, that was in the autumn, also. Q. Of 07? A. Yes. No yes, the autumn of 07, I believe, or it might	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them? A. No. Q. And is there any way that the group conducts business? For instance, are there is there an annual meeting? How does the group conduct its business? A. There was recently an annual meeting, a teleconference.	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that? A. Yes, that was in the autumn, also. Q. Of 07? A. Yes. No yes, the autumn of 07, I believe, or it might Q. Would your journal or	Page 149
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	it in? A. I'm sure he did. Q. You just don't know one way or the other? A. No, I'm pretty sure he did. Q. You think that he would have? A. I think he did. Q. Okay. A. I think his name was mentioned also at this meeting. Q. Okay. The other people who might be members, you don't know anything about them? A. No. Q. And is there any way that the group conducts business? For instance, are there is there an annual meeting? How does the group conduct its business? A. There was recently an annual	Page 147	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	same room as Maria Gallagher? A. No, it was a teleconference. We did it by phone. Q. You said something earlier about seeing her taking notes or something. So you don't know whether anyone took any notes? A. No, no. No, I saw her taking notes in Pittsburgh when we were we had a physical meeting. Q. This meeting that took place, this telephone conversation, it was in what month? A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that? A. Yes, that was in the autumn, also. Q. Of 07? A. Yes. No yes, the autumn of 07, I believe, or it might	Page 149

	Case 1:07-cv-06362 Doc	ument 19	-5	Filed 03/06/2008 Page 19 of 24	
		Page 150			Page 152
1	A. Yes, probably it would give		1	remember.	
2	a date.		2	Q. And why were they removed?	
3	Q. Okay.		3	A. I don't know.	
4	A. Probably.		4	Q. There was no discussion as	
5	Q. And you don't know any		5	to why they're going to be removed?	
6	participants besides yourself and Maria?		6	A. No.	
7	 A. No, I know that there were 		7	Q. Any other votes taken other	
8	some people that were there by proxy.		8	than who's going to be the officers?	
9	Q. Okay. What does that mean		9	A. I don't believe so.	
10	by proxy?		10	Q. Okay. Ma'am, with respect	
11	 A. That they had given 		11	to your own disability.	
12	permission to Maria for voting purposes.		12	A. Yes.	
13	Q. Who was given permission?		13	Q. How long have you been	
14	What people?		14	disabled?	
15	A. Members that weren't present.		15	A. I've been in a wheelchair it	
16	Q. Correct. But who are they?		16	will be seven years this spring.	
17	A. I know one was Marcus was		17	Q. Okay. And I'm sorry, this	
18	not present at the teleconference.		18	might be difficult but what were the	
19	Q. Anybody else?		19	circumstances that led you to start	
20	A. I don't know. I know that		20	using a wheelchair?	
21	there were other people spoken of but I		21	A. I have multiple sclerosis and	
22	can't remember names.		22	getting around with the walker became	
23	Q. Okay. And what votes were		23	increasingly more difficult.	
24	taken at that meeting, the telephone		24	Q. Okay. And at some point in	
25	conference annual meeting?		25	time, you were not able to walk?	
_		Page 151			Page 153
1	A. It was a teleconference and		1	A. That is correct.	
2	I'm sure Maria took minutes of what was		2	Q. And when was that?	
3	transpiring.		3	A. It'll be seven years in the	
4	Q. Do you have any notes about		4	spring.	
5	that meeting?		5	Q. Okay. And in terms of	
6	A. I do not.		6	treatment for that, are there anything	
7	Q. But what was voted on? You				
8	said there was votes taken.		7	that you in terms of a drug regiment	
			8	or anything else?	
9	A. Officers.		8 9	or anything else? A. No, I'm not. I've chosen	
10	A. Officers.Q. Okay. That's when you		8 9 10	or anything else? A. No, I'm not. I've chosen not to do a drug regiment.	
10 11	A. Officers. Q. Okay. That's when you became elected?		8 9 10 11	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone	
10 11 12	A. Officers.Q. Okay. That's when you		8 9 10	or anything else? A. No, I'm not. I've chosen not to do a drug regiment.	
10 11	A. Officers. Q. Okay. That's when you became elected?		8 9 10 11	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone	
10 11 12	A. Officers.Q. Okay. That's when youbecame elected?A. That is correct.		8 9 10 11 12	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like	
10 11 12 13	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted?		8 9 10 11 12 13	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment?	
10 11 12 13 14	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not		8 9 10 11 12 13 14	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist	
10 11 12 13 14 15	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not sure.		8 9 10 11 12 13 14 15	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist and an internist both that oversee my	
10 11 12 13 14 15 16	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not sure. Q. And what other officers were		8 9 10 11 12 13 14 15 16	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist and an internist both that oversee my health care.	
10 11 12 13 14 15 16 17	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not sure. Q. And what other officers were created at that meeting besides yourself?		8 9 10 11 12 13 14 15 16	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist and an internist both that oversee my health care. Q. Okay. And in addition to the wheelchair, is there any other way,	
10 11 12 13 14 15 16 17 18 19	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not sure. Q. And what other officers were created at that meeting besides yourself? A. I don't know that anybody		8 9 10 11 12 13 14 15 16 17 18	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist and an internist both that oversee my health care. Q. Okay. And in addition to the wheelchair, is there any other way, you know, I guess, can you explain for	
10 11 12 13 14 15 16 17 18 19 20	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not sure. Q. And what other officers were created at that meeting besides yourself?		8 9 10 11 12 13 14 15 16 17 18 19 20	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist and an internist both that oversee my health care. Q. Okay. And in addition to the wheelchair, is there any other way, you know, I guess, can you explain for us, in other words, how it affects you?	
10 11 12 13 14 15 16 17 18 19 20 21	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not sure. Q. And what other officers were created at that meeting besides yourself? A. I don't know that anybody else was created but I think someone was removed.		8 9 10 11 12 13 14 15 16 17 18 19 20 21	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist and an internist both that oversee my health care. Q. Okay. And in addition to the wheelchair, is there any other way, you know, I guess, can you explain for us, in other words, how it affects you? A. I'm not sure what you're	
10 11 12 13 14 15 16 17 18 19 20 21 22	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not sure. Q. And what other officers were created at that meeting besides yourself? A. I don't know that anybody else was created but I think someone was removed. Q. Someone were what?		8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist and an internist both that oversee my health care. Q. Okay. And in addition to the wheelchair, is there any other way, you know, I guess, can you explain for us, in other words, how it affects you? A. I'm not sure what you're asking. The wheelchair being in a	
10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not sure. Q. And what other officers were created at that meeting besides yourself? A. I don't know that anybody else was created but I think someone was removed. Q. Someone were what? A. Someone was removed.		8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist and an internist both that oversee my health care. Q. Okay. And in addition to the wheelchair, is there any other way, you know, I guess, can you explain for us, in other words, how it affects you? A. I'm not sure what you're asking. The wheelchair being in a wheelchair affects every element of my	
10 11 12 13 14 15 16 17 18 19 20 21 22	A. Officers. Q. Okay. That's when you became elected? A. That is correct. Q. And how many people voted? A. I'm not positive. I'm not sure. Q. And what other officers were created at that meeting besides yourself? A. I don't know that anybody else was created but I think someone was removed. Q. Someone were what?		8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	or anything else? A. No, I'm not. I've chosen not to do a drug regiment. Q. Okay. And is there someone that you see, a doctor or anything like that, for treatment? A. Sure, I have a neurologist and an internist both that oversee my health care. Q. Okay. And in addition to the wheelchair, is there any other way, you know, I guess, can you explain for us, in other words, how it affects you? A. I'm not sure what you're asking. The wheelchair being in a	

				Filed 03/00/2006 Fage 20 0i 24	
		Page 154			Page 156
1	may be a dumb question, too broad.		1	residential treatment of emotionally	
2	Obviously, you're limited substantially		2	disturbed kids.	
3	in terms of the wheelchair; and then,		3	Q. What is your present age?	
4	therefore, that has implications for		4	A. 60.	
5	many of the things you do, correct?		5	Q. 60?	
6	A. Correct.		6	A. Yes.	
7	Q. When did you last have		7	Q. And what's your present	
8	employment?		8	address?	
9	A. Outside of my home I worked		9	A. 2501 North Taylor Road,	
10	in the wheelchair for selling AT&T		10	Apartment 310, Cleveland Heights, Ohio,	
11	cell phones out of Best Buy after I		11	44118.	
12	went into the wheelchair, as kind of a		12	Q. And do you've lived there	
13	test case.		13	about how long?	
14	Q. What do you mean a test		14	A. Two years in March.	
15	case, to see if you could do it?		15	Q. Okay. Where did you live	
16	A. I mean, I have not worked		16	before that?	
17	outside of the home from that since		17	A. I lived in Avon Lake on Lear	
18	I had been disabled. So I wanted to		18	Road.	
19	see what I could do in the wheelchair.		19	Q. Okay. And you have three	
20	Q. I got you. So you said your		20	children; they're all in their 20's or	
21	disability began in terms of the		21	above?	
22	wheelchair began in what, about 2001?		22	A. Yes.	
23	A. Yeah.		23	Q. And do you have any sources	
24	Q. Okay. Were you working		24	of income?	
25	before 2001?		25	A. Social Security Disability.	
ļ				<u></u>	
1					
		Page 155			Page 157
1	A. Sure.	Page 155	1	Q. And how long have you had	Page 157
2	Q. In what capacity?	Page 155	2	that?	Page 157
2	Q. In what capacity?A. I sold ads. I was an ad	Page 155	2 3	that? A. Since I became disabled.	Page 157
2 3 4	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times	Page 155	2 3 4	that? A. Since I became disabled. Q. So you went through the	Page 157
2 3 4 5	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper.	Page 155	2 3 4 5	that? A. Since I became disabled. Q. So you went through the process of application, all that, back	Page 157
2 3 4 5 6	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland?	Page 155	2 3 4 5 6	that? A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's?	Page 157
2 3 4 5 6 7	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local	Page 155	2 3 4 5 6 7	that? A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct.	Page 157
2 3 4 5 6 7 8	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper.	Page 155	2 3 4 5 6 7 8	that? A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded	Page 157
2 3 4 5 6 7 8	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have	Page 155	2 3 4 5 6 7 8 9	that? A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct?	Page 157
2 3 4 5 6 7 8 9	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for?	Page 155	2 3 4 5 6 7 8 9	that? A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was.	Page 157
2 3 4 5 6 7 8 9 10	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years.	Page 155	2 3 4 5 6 7 8 9 10	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do	Page 157
2 3 4 5 6 7 8 9 10 11 12	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before	Page 155	2 3 4 5 6 7 8 9 10 11 12	hat? A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income?	Page 157
2 3 4 5 6 7 8 9 10 11 12 13	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that?	Page 155	2 3 4 5 6 7 8 9 10 11 12 13	that? A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No.	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I	Page 155	2 3 4 5 6 7 8 9 10 11 12 13 14	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is		2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month?	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month.	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is what I considered my primary occupation. Q. Okay.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	hat? A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month. Q. Okay. Now, ma'am, you	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is what I considered my primary occupation.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month. Q. Okay. Now, ma'am, you indicated that when you came back from	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is what I considered my primary occupation. Q. Okay.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	hat? A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month. Q. Okay. Now, ma'am, you	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is what I considered my primary occupation. Q. Okay. A. I was a salesperson in a		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month. Q. Okay. Now, ma'am, you indicated that when you came back from	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is what I considered my primary occupation. Q. Okay. A. I was a salesperson in a variety of capacities.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month. Q. Okay. Now, ma'am, you indicated that when you came back from your trip to the Chicago area to see	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is what I considered my primary occupation. Q. Okay. A. I was a salesperson in a variety of capacities. Q. And related to newspapers		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month. Q. Okay. Now, ma'am, you indicated that when you came back from your trip to the Chicago area to see your son in August of 2007, you spoke	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is what I considered my primary occupation. Q. Okay. A. I was a salesperson in a variety of capacities. Q. And related to newspapers or		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month. Q. Okay. Now, ma'am, you indicated that when you came back from your trip to the Chicago area to see your son in August of 2007, you spoke to this expert about a whole variety of	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is what I considered my primary occupation. Q. Okay. A. I was a salesperson in a variety of capacities. Q. And related to newspapers or		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month. Q. Okay. Now, ma'am, you indicated that when you came back from your trip to the Chicago area to see your son in August of 2007, you spoke to this expert about a whole variety of places that you had had troubles with,	Page 157
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. In what capacity? A. I sold ads. I was an ad salesperson for the Free Times Newspaper. Q. Is that in Cleveland? A. Yes, it is. It's a local alternative newspaper. Q. And how long did you have the job for? A. Five years. Q. Okay. And what about before that? A. A variety of things but I raised three children also, which is what I considered my primary occupation. Q. Okay. A. I was a salesperson in a variety of capacities. Q. And related to newspapers or A. Newspapers and I sold other things, as well. I worked for a I		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Since I became disabled. Q. So you went through the process of application, all that, back in the late 1990's, early 2000's? A. Correct. Q. Okay. And you were awarded disability, correct? A. I was. Q. Besides the SSI payments, do you receive any other sources of income? A. No. Q. And how much do you receive roughly per month? A. Almost \$800 a month. Q. Okay. Now, ma'am, you indicated that when you came back from your trip to the Chicago area to see your son in August of 2007, you spoke to this expert about a whole variety of places that you had had troubles with, right?	Page 157

Case 1.07-CV-00302 D0C				
	Page 158			Page 160
 A. I don't know exactly but I 		1	everywhere pretty much are the same.	
know that Chicago was trying. It was a		2	Q. Okay. And I take it, it was	
trying environment.		3	the same circumstances that lead you to	
•				
			-	
- -		_		
· · · · · · · · · · · · · · · · · · ·		7		
· · · ·		6	·	
= **				
A. I can't tell you. I don't			A. Correct.	
know.		12	Q. When did you start filing	
Q. You don't know how many		13	lawsuits?	
		14	A. Shortly after I became	
			- ,	
_				
			- · · · · · · · · · · · · · · · · · · ·	
you filed about eight or nine others; is			Q. What's your best estimate?	
that right?		25	A. I would certainly say	
	Page 159			Page 161
A. Perhaps.		1	somewhere between 70 and a hundred.	
		ı		
		ı		
		4		
- · · · · · · · · · · · · · · · · · · ·			· ·	
		_		
Q. Okay. And they all have		9		
essentially the identical allegations,		10	area?	
right?		11	A. Yes.	
A. Pretty much.		12	Q. What other geographic	
Q. Okay. In terms of the		13	locations have you filed lawsuits in?	
alleged violations, they all have		14	A. I went to New Jersey once	
essentially the identical allegations,		15	and so there's some cases that are	
cocontain, are recruited aneguations,		1	pending in New Jersey.	
right?		116		
right?		16		
A. Similar.		17	Q. About how many?	
A. Similar. Q. Okay. And I'm trying to		17 18	Q. About how many?A. Three or four.	
A. Similar. Q. Okay. And I'm trying to understand if all these different places		17 18 19	Q. About how many?A. Three or four.Q. And they were also filed in	
A. Similar. Q. Okay. And I'm trying to understand if all these different places had all sorts of different violations,		17 18 19 20	Q. About how many?A. Three or four.Q. And they were also filed in conjunction with Disabled Patriots?	
A. Similar. Q. Okay. And I'm trying to understand if all these different places		17 18 19 20 21	Q. About how many? A. Three or four. Q. And they were also filed in conjunction with Disabled Patriots? A. I believe so, yes.	
A. Similar. Q. Okay. And I'm trying to understand if all these different places had all sorts of different violations,		17 18 19 20	Q. About how many?A. Three or four.Q. And they were also filed in conjunction with Disabled Patriots?	
A. Similar. Q. Okay. And I'm trying to understand if all these different places had all sorts of different violations, why are the allegations in the eight or nine or ten lawsuits essentially		17 18 19 20 21	Q. About how many? A. Three or four. Q. And they were also filed in conjunction with Disabled Patriots? A. I believe so, yes.	
A. Similar. Q. Okay. And I'm trying to understand if all these different places had all sorts of different violations, why are the allegations in the eight or		17 18 19 20 21 22	Q. About how many? A. Three or four. Q. And they were also filed in conjunction with Disabled Patriots? A. I believe so, yes. Q. Okay. And where in New	
	Q. What I'm getting at, I guess, is well, just forget that. How many other lawsuits have you filed that are based upon your visit to the Chicago area in August 2007? A. I'm not sure. Q. Approximately? A. I can't tell you. I don't know. Q. You don't know how many lawsuits you filed? A. No, I file a lot of lawsuits, sir. Q. Is this more than 25? A. No, no, no. Q. Less than ten? A. In Chicago, less than ten. Q. Okay. At the time you filed this particular lawsuit that we're here for today, at or about that same time you filed about eight or nine others; is that right? A. Perhaps. Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in federal court in Chicago in the Northern District of Illinois? A. Correct. Q. Okay. And they all have essentially the identical allegations, right? A. Pretty much.	Q. What I'm getting at, I guess, is well, just forget that. How many other lawsuits have you filed that are based upon your visit to the Chicago area in August 2007? A. I'm not sure. Q. Approximately? A. I can't tell you. I don't know. Q. You don't know how many lawsuits you filed? A. No, I file a lot of lawsuits, sir. Q. Is this more than 25? A. No, no, no. Q. Less than ten? A. In Chicago, less than ten. Q. Okay. At the time you filed this particular lawsuit that we're here for today, at or about that same time you filed about eight or nine others; is that right? Page 159 A. Perhaps. Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in federal court in Chicago in the Northern District of Illinois? A. Correct. Q. Okay. And they all have essentially the identical allegations, right? A. Pretty much.	Q. What I'm getting at, I guess, is well, just forget that. How many other lawsuits have you filed that are based upon your visit to the Chicago area in August 2007? A. I'm not sure. Q. Approximately? A. I can't tell you. I don't know. Q. You don't know how many lawsuits you filed? A. No, I file a lot of lawsuits, sir. Q. Is this more than 25? A. No, no, no. Q. Less than ten? A. In Chicago, less than ten. Q. Okay. At the time you filed this particular lawsuit that we're here for today, at or about that same time you filed about eight or nine others; is that right? A. Perhaps. Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in federal court in Chicago in the Northern District of Illinois? A. Correct. Q. Okay. And they all have essentially the identical allegations, right? A. Pretty much.	Q. What I'm getting at, I guess, is well, just forget that. How many other lawsuits have you filed that are based upon your visit to the Chicago area in August 2007? A. I'm not sure. Q. Approximately? A. I can't tell you. I don't know. Q. You don't know how many lawsuits you filed? A. No, I file a lot of lawsuits, sir. Q. Is this more than 25? A. In Chicago, less than ten. Q. Okay. At the time you filed this particular lawsuit that we're here for today, at or about that same time you filed about eight or nine others; is that right? Page 159 A. Perhaps. Q. Well, is that your best estimate? A. Yes. Q. And you didn't make any then they were filed? A. Correct. Q. When did you start filing lawsuits? A. Shortly after I became intowned with Disabled Patriots. Q. And of all the suits you've filed, have they been in conjunction with Disabled Patriots? A. I don't know if it's a hundred. Q. And is it fair to say you filed more than a hundred so far? A. I don't know if it's a hundred. Q. What's your best estimate? A. In the Greater Cleveland area, yes. Q. And you filed this federal court in Chicago in the Northern District of Illinois? A. Correct. Q. Okay. And they all have essentially the identical allegations, right? A. Pretty much. 4 file those other eight or nine or ten in the mail, you looked at them, and then they were filed? A. Correct. Q. And you didn't make any changes to them? A. Correct. Q. When did you start filing a. A. Shortly after I became intowned with Disabled Patriots. Q. When did you start filing a. A. Fretty much, yes. Q. And fell the suits you've filed more than a hundred so far? A. I don't know if it's a hundred. Q. Have they all been filed in federal courts around the country? A. In the Greater Cleveland area, yes. Q. So before you filed this batch of Chicago lawsuits in the fall of area? Yes. Q. Okay. And they all have essentially the identical allegations, right? A. Pretty much.

	Case 1.07-CV-00302 DOCC	illiellt 19	-5	Filed 03/00/2006 Fage 22 01 24	
1 2 3 4 5 6	still pending? A. Yes. Q. Okay. Has Mr. Bacon been your attorney for all these cases? A. I work with a number of attorneys and I can't tell you right now	Page 162	1 2 3 4 5 6	here, right? A. Absolutely, I have copies of complaints. I have copies of filed suits. I have copies of outcomes of everything. Q. So if we asked you to	Page 164
7 8 9 10	offhand Q. Okay. A who does what. Q. So New Jersey, Cleveland, and		7 8 9 10	other lawsuits, you'd have a whole batch of stuff you could produce? A. Yes, I do.	
11 12 13 14	Chicago, those are the areas you can recall that you filed these federal lawsuits in? A. Columbus, Ohio.		11 12 13 14	Q. Okay. Other than having	
15 16 17 18	Q. Also in federal court? A. Yes. Q. Okay. And did you file a whole bunch of them there?		15 16 17 18	A. No, but I'm in constant contact with Maria Gallagher. Q. Okay. Have you filed any suits in state court?	
19 20 21 22	A. Yes. Q. About how many? A. I can't tell you. Q. Dozens?	i	19 20 21 22	A. I'm not in state court. I'm not aware of having filed any in state court. Q. Have you been sued by	
23 24 25	A. I don't think dozens but certainly Q. More than ten?		23 24 25	anybody? A. In relation to what? Q. Anything.	
1 2	A. Maybe not. Maybe around ten, I don't know.	Page 163	1 2	A. I can't say that I've never been sued. I might have been sued for	Page 165
3 4 5 6	Q. Okay. Do you keep any records of any list or anything like that, that would identify all the various cases, these 75 or so you filed		3 4 5 6	debt-related purposes. Q. You've been sued by like a collection type cases? A. Yes.	
7 8 9 10	across the country? A. No. Q. And do you keep your deposition transcripts or pleadings or		7 8 9 10	Q. Okay. And how many times have you been sued as a defendant? A. I don't know. Q. More than ten?	
11 12 13 14	anything from these cases? A. No, but I have tons of paperwork to substantiate it all Q. I don't know what you mean,		11 12 13 14	A. No. Q. Less than ten? A. Yes. Q. More than five?	
15 16 17 18	Ma'am, you know, pleadings from the case A. Yes. Q or do you		15 16 17 18	A. I don't know. Q. Okay. And have those suits all been filed in state court in the Cleveland area?	
19 20 21 22	A. Yes. Q just mean your own notes? A. No, no, no. When I get any kind of legal anything, it's all kept on		19 20 21 22	A. I would imagine. Q. And you have copies of some of the pleadings and things from those cases?	
23 24 25	file. Q. So you have for instance, you have a copy of the suit you filed		23 24 25	A. Maybe. Q. Okay. They might be part of the body of documents we talked about	

1 some of these documents you identified 2 A. Correct. 3 Q. And apart from and all 4 five of those or so, they were all 5 collection type matters? 6 A. Yes. 7 Q. Have you ever been sued as a 8 defendant in any other type of case? 9 A. I can't think what. 10 Q. Okay. And then have you 11 been other than the Disabled Patriots 12 type of cases we've talked about and the 13 collections cases, have you ever been a 14 party to or a witness in any other 15 types of cases that you can recall? 16 A. I have a personal injury 17 case pending right now. 18 Q. And where is that case 19 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 23 truth is, it might now and the sor us but I don't have any questions 2 for us but I don't have any questions 3 right now. Counsel? 4 THE WITNESS: Tom? 6 MR. LEONARD: Mr. Bacon? 6 MR. BACON: I apologize. I keep 7 this button on so if I start talking and then realize no one's hearing me. 9 No, I have no questions at this time. 10 You want to just talk about 11 whether or not she wants to waive 12 or 13 MR. LEONARD: Yeah. Ma'am, under 14 the rules, you're entitled to receive a 15 topy of this transcript and review it 16 for accuracy or to waive that right and 17 not receive that and to have what the 18 court reporter has typed as your 19 testimony. 20 What do you choose to do? 21 Q. In state court? 22 way. I have confidence 23 truth is, it might not have even been 24 filed yet. We're 25 Q. Who's your attorney? 26 MR. BACON: We'd like to see it.		Case 1.07-CV-00302 D00		•	Filed 03/00/2006 Page 23 01 24	
1 before? 2 A. Correct. 3 Q. And apart from and all 4 five of those or so, they were all 5 collection type matters? 6 A. Yes. 7 Q. Have you ever been sued as a 8 defendant in any other type of case? 9 A. I can't think what. 10 Q. Okay. And then have you 11 been other than the Disabled Patriots 12 type of cases we've talked about and the 13 collections cases, have you ever been a 14 party to or a witness in any other 15 types of cases that you can recall? 16 A. I have a personal injury 17 case pending right now. 18 Q. And where is that case 19 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. Pennsylvania. 23 Q. Who's your attorney? 24 filed yet. We're 25 Q. Who's your attorney? 25 Q. And what's the nature of 3 that matter, ma'am' 4 A. I was on a wheelchair lift 6 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 4 A. Bus company. 11 Q. Bus company? 12 A. Yesh, it's 3 Q. But you're not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a party or a witness that we haven't 22 talked about so far, ma'am? 23 A. No. 24 A. I was fire reases 15 yer or a witness that we haven't 26 talked about so far, ma'am? 27 A. I and then involved in, either as a party or a witness that twe haven't 28 talked about so far, ma'am? 29 A. To not sure if it's been 16 filed yet. 20 A. No. 21 A. No. 22 Yes or and I was thrown 7 feet to the 23 filed it yet? 24 A. Yesh, it's 3 Q. Okay. Any other cases 3 you've been involved in, either as a 3 party or a witness that we haven't 29 talked about so far, ma'am? 20 A. No. 21 A. No. 22 MR. LEONARD: We'd like to see it. 24 A. No. 25 Yes of this transcript any queve the art fight. 26 A. The not sure if it's been 16 filed yet. 27 A. No. 28 Yes of the second in we'd like of the court reporter has byped as your 29 testimony. 29 Yes of the second in was thrown 7 feet to the 30 Yes of the second in was thrown 7 feet to the 31 Yes of the second			Page 166			Page 168
2 A. Correct. 3 Q. And apart from — and all 4 five of those or so, they were all 5 collection type matters? 6 A. Yes. 7 Q. Have you ever been sued as a defendant in any other type of case? 9 A. I can't think what. 10 Q. Okay. And then have you been — other than the Disabled Patriots type of cases we've talked about and the lift or access that you can recall? 16 A. I have a personal injury case pending right now. 17 Q. And where is that case filled aland and part of a case share you are recall? 18 Q. And where is that case filled aland and the lift on a vacation last summer and the lift or broke and I was throw? feet to the ground. 19 Q. Bus company? 10 Q. Bus company? 11 Q. Bus company? 12 A. Yeah, it's — Q. Okay. Any other cases party or a witness that we haven't talked about so far, ma'am? 18 Q. Bus company? 19 A. I mort sure if it's been filled yet. 10 Q. Okay. Any other cases on party or a witness that we haven't talked about so far, ma'am? 20 A. Tan't think what. 21 A. No. 22 MR. LEONARD: Okay. I don't take any questions on file start talking and free with lift on the very out on the realize none's hearing me. 2 for us that I apologize. I keep of this button on so if I start talking and the realize none's hearing me. 3 that matters or other than the Disabled Patriots 4 the ruelse, you're entitled to receive a court receive a court reporter has typed as your testimony. 4 A. I was on a wheelchair lift on the very the than the order than the part of the provided in the lift or we and in the lift on the very the the part of the provided in the lift or we can be any the part of the provided in the lift or we can be any the part of the	1	before?	_	1	some of these documents you identified	_
4 five of those or so, they were all 5 collection type matters? 6 A. Yes. 7 Q. Have you ever been sued as a 8 defendant in any other type of case? 9 A. I can't think what. 10 Q. Okay. And then have you 11 been - other than the Disabled Patriots 12 type of cases we've talked about and the 13 collections cases, have you ever been a 14 party to or a witness in any other 15 types of cases that you can recall? 16 A. I have a personal injury 17 case pending right now. 18 Q. And where is that case 19 filed, ma'am? 19 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 24 truth is, it might not have even been 25 dry ho's your attorney? 26 A. I was on a wheelchair lift 27 on a vacation last summer and the lift 38 O. Who is the defendant or a 39 possible defendant? 4 A. I was on a wheelchair lift 5 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company? 11 Q. Bus company? 11 Q. Bus company? 11 Q. Bus company? 11 Glied it yet? 12 A. Yeah, it's 13 Q. Okay. Any other cases 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a party or a witness that we haven't talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right and not receive that and to have what the court reporter has typed as your testimony. 24 THE WITNESS: Tom? 25 MR. LEONARD: Welf, it's your decision. 26 MR. BACON: 12 not not so we'ke the right and not receive that and to have what the court reporter has typed as your testimony. 26 Who's your attorney? 27 THE WITNESS: Tom? 28 MR. LEONARD: Welf, it's your decision. 29 MR. LEONARD: Welf, it's your decision. 30 MR. LEONARD: Welf, it's your decision. 31 THE WITNESS: Thanks. 32 (Off the record at 4:35 p.m.) 32 (Off the record at 4:35 p.m.) 33 (Off the record at 4:35 p.m.) 34 (Off the record at 4:35 p.m.) 35 (Off the record at 4:35 p.m.) 36 (Off t	2			2		
4 THE WITNESS: Tom? 5 collection type matters? 6 A. Yes. 7 Q. Have you ever been sued as a defendant in any other type of case? 9 A. I can't think what. 10 Q. Okay. And then have you 11 been — other than the Disabled Patriots 12 type of cases we've talked about and the 12 type of cases we've talked about and the 12 type of cases we've talked about and the 13 collections cases, have you can recall? 14 party to or a witness in any other 15 types of cases that you can recall? 16 A. I have a personal injury 17 case pending right now. 18 Q. And where is that case 19 filed, ma'am? 19 A. Pennsylvania. 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may — the 18 that matter, ma'am? 23 truth is, it might not have even been 2 fled yet. We're — 25 Q. Mrho's your attorney? 1 A. Lawrence Fuller. 2 Q. And what's the nature of 2 froke and I was thrown 7 feet to the 2 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 Q. Bus company. 11 Q. Bus company. 11 Q. Bus company. 11 Giel it yet? 12 A. 17 m not sure if it's been 16 filed yet. 13 Q. Okay. Any other cases 18 you've been involved in, either as a party or a witness that we haven't 21 talked about so far, ma'am? 24 A. No. 25 MR. LEONARD: Okay. I don't 22 work page involved been involved in, either as a party or a witness that we haven't 24 talked about so far, ma'am? 20 A. No. 21 A. No. 22 MR. LEONARD: Okay. I don't 22 who are an involved in, either as a party or a witness that we haven't 24 talked about so far, ma'am? 26 MR. LEONARD: Okay. I don't 22 when a war further questions for you right 24 now, ma'am. I certainly may issue a						
5 collection type matters? 6 A. Yes. 7 Q. Have you ever been sued as a 8 defendant in any other type of case? 9 A. I can't think what. 10 Q. Okay. And then have you 10 been to ther than the Disabled Patriots 11 type of cases we've talked about and the 13 collections cases, have you ever been a 14 party to or a witness in any other 15 types of cases that you can recall? 15 case pending right now. 16 A. I have a personal injury 17 case pending right now. 17 case pending right now. 18 Q. And where is that case 19 filed, ma'am? 19 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 22 truth is, it might not have even been 23 filed yet. We're 25 Q. Who's your attorney? 25 Q. And what's the nature of 6 proke and I was thrown 7 feet to the 7 ground. 26 Q. Who is the defendant or a possible defendant? 10 Q. Bus company. 27 Q. Bus company. 28 Q. Was company. 29 D. Bus company. 20 A. Yeah, it's Q. Okay. Any other cases 18 you've been involved in, either as a party or a witness that we haven't 29 those and province in the year of where it's pour weeks. 29 D. Bus company? 10 C. Bus company? 11 C. A. Lidwelf it's each of filed yet. We're Q. Bus company. 10 C. Bus company. 10 C. Bus company. 10 C. Bus company. 11 C. Bus company. 11 C. Bus company. 12 A. Yeah, it's Q. Okay. Any other cases 18 you've been involved in, either as a party or a witness that we haven't 21 talked about so far, ma'am? 20 L. A. No. 22 MR. LEONARD: Okay. I don't 22 Laked about so far, ma'am? 20 Laked about so far, ma'am? 21 Laked about so far, ma'am? 22 Laked about so far, ma'am? 22 Laked about so far, ma'am? 23 Laked about so far, ma'am? 24 Laked about so far, ma'am? 25 Laked about so far, ma'am? 26 Laked about so far, ma'am? 27 Laked about so far, ma'am? 28 Laked					•	
6 A. Yes. 7 Q. Have you ever been sued as a 8 defendant in any other type of case? 9 A. I can't think what. 10 Q. Okay. And then have you 11 been other than the Disabled Patriots 12 type of cases we've talked about and the 13 collections cases, have you ever been a 14 party to or a witness in any other 15 types of cases that you can recall? 16 A. I have a personal injury 17 case pending right now. 18 Q. And where is that case 18 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 23 truth is, it might not have even been 24 filed yet. We're 25 Q. Who's your attorney? 26 A. Lawrence Fuller. 27 Q. And what's the nature of 28 that matter, ma'am? 38 defendant in any other 39 No, 1 have no questions at this biout 40 whether or not she wants to waive 41 whether or not she wants to waive 41 the rules, you're entitled to receive a 41 to receive that and to have what the 41 court reporter has typed as your 41 testimony. 42 What do you choose to do? 43 THE WITNESS: I'm fine either 44 A. I was on a wheelchair lift 54 on a vacation last summer and the lift 65 broke and I was thrown 7 feet to the 67 ground. 8 Q. Who is the defendant or a 9 possible defendant? 9 NoTARY PUBLIC: Yeah, the days, 4 The WITNESS: Thanks. 10 (Off the record at 4:35 p.m.) 11 (Off the record at 4:35 p.m.) 12 A. Yeah, it's 13 Q. Bus company? 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 9 party or a witness that we haven't 19 talked about so far, ma'am? 20 A. No. 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a				5		
7 Q. Have you ever been sued as a defendant in any other type of case? 9 A. I can't think what. 10 Q. Okay. And then have you 11 been other than the Disabled Patriots 12 type of cases we've talked about and the collections cases, have you ever been a party to or a witness in any other types of cases that you can recall? 15 types of cases that you can recall? 16 A. I have a personal injury case pending right now. 17 case pending right now. 18 Q. And where is that case filled, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the truth is, it might not have even been a filed yet. We're Q. And what's the nature of that matter, ma'am? 4 A. I was on a wheelchair lift broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a possible defendant? 10 A. Bus company. 11 Q. Bus company. 11 Grace and what's then at your decision. 12 Q. Okay. Any other cases a party or a witness that we haven't talked about so far, ma'am? 12 A. No. 13 draft falking and then realize no one's hearing me. No, I have no questions at this time. 14 You want to just talk about where to waive the twait is divented to receive a copy of this transcript and review it the rules, you're entitled to receive a copy of this transcript and review it the rules, you're entitled to receive a copy of this transcript and review it the rules, you're entitled to receive a copy of this transcript and review it the rules, you're entitled to receive a copy of this transcript and review it the rules, you're entitled to receive a copy of this transcript and review it the rules, you're entitled to receive a copy of this transcript and review it the rules, you're entitled to receive a copy of the rules, you're entitled to receive a copy of the rules, you're entitled to receive a copy of the rules, you're entitled to receive a copy of the rules, you're entitled to receive a copy of the r		• •				
defendant in any other type of case? A. I can't think what. Q. Okay. And then have you been other than the Disabled Patriots type of cases we've talked about and the collections cases, have you ever been a party to or a witness in any other types of cases that you can recall? A. I have a personal injury case pending right now. Q. And where is that case flied, ma'am? Q. And where is that case flied, ma'am? Q. An istate court? Q. An istate court? Q. An istate court? Q. Who's your attorney? Page 167 A. Lawrence Fuller. Q. And what's the nature of that matter, ma'am? A. I was on a wheelchair lift on a vacation last summer and the lift of broke and I was thrown 7 feet to the ground. Q. Who is the defendant or a possible defendant? A. Yeah, it's Q. But you're ent sure if it's been flield yet. Q. Okay. Any other cases 18 you've been involved in, either as a party or a witness that we haven't talked about so far, ma'am? A. No. I have no questions at this time. You want to just talk about whether or not she wants to waive or You want to just talk about whether or not she wants to waive or You want to just talk about whether or not she wants to waive or Whether or not she wants to waive or Whether or not she wants to waive or Understandand blee they or Core. MR. LEONARD: Yeah. Ma'am, under the rules, you're entitled to receive a topy of this transcript and review it for accuracy or to waive that right and nor receive that and to have what the court reporter has typed as your testimony. What do you choose to do? THE WITNESS: Tim fine either way, I have confidence MR. LEONARD: Well, it's your decision. THE WITNESS: Okay. MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks. (Ourt Reporter, what's regular delivery, two weeks or so? NOTARY PUBLIC: Yeah, ten days, tow weeks. MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks. (Off the record at 4:35 p.m.) LEONARD: All right Ma'am, thanks very much for your time and Miss Court Reporter, what's regular delivery. Thankse						
9 A. I can't think what. Q. Okay. And then have you 11 been other than the Disabled Patriots 12 type of cases we've talked about and the 13 collections cases, have you ever been a 14 party to or a witness in any other 15 types of cases that you can recall? 16 A. I have a personal injury 17 case pending right now. 18 Q. And where is that case 19 filed, ma'am? 19 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 23 truth is, it might not have even been 24 filed yet. We're 25 Q. Who's your attorney? 26 A. I was on a wheelchair lift 5 on a vacation last summer and the lift 5 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company. 12 Q. Bus company. 13 MR. LEONARD: We'd like to see it. 14 A. I'm not sure if it's been 15 filed yet. 16 Q. Okay. Any other cases 18 you've been involved in, either as a 9 party or a witness that we haven't 14 ther rules, you're entitled to receive a 15 copy of this transcript and review it 16 fire rocarcarcy or to waive that right and 17 not sere with transcript and review it 18 court reporter has typed as your 19 testimony. 19 testimony. 10 What do you choose to do? 11 THE WITNESS: I'm fine either 22 way. I have confidence 23 MR. LEONARD: We'll like to see it. 24 decision. 25 MR. BACON: We'd like to see it. 26 MR. BACON: We'd like to see it. 27 Wo weeks or so? 28 MR. LEONARD: All right. Ma'am, 19 thanks very much for your time and Miss 29 to verybody. 20 THE WITNESS: Thanks. 21 THE WITNESS: Thanks. 22 Wo weeks. 23 MR. LEONARD: Okay. Thanks a 24 lot verybody. 25 thanks a lot verybody. 26 THE WITNESS: Thanks. 27 two weeks. 28 MR. LEONARD: Okay. Thanks a 29 lot verybody. 29 lot verybody. 20 THE WITNESS: Thanks. 20 THE WITNESS: Thanks. 21 LONARD: Okay. Thanks a 22 LONARD: Okay. And when't all the defendant or a 23 party or a witness that we haven't all the defendant or a 24 party or a witness that we haven't all the defendant or a 25 Party or a witness that we ha						
10 Q. Okay. And then have you 11 been other than the Disabled Patriots 12 type of cases we've talked about and the 13 collections cases, have you ever been a 14 party to or a witness in any other 15 types of cases that you can recall? 16 A. I have a personal injury 17 case pending right now. 18 Q. And where is that case 18 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 13 truth is, it might not have even been 24 filed yet. We're:- 25 Q. Who's your attorney? 26 A. Lawrence Fuller. 2 Q. And what's the nature of 3 that matter, ma'am? 4 A. Lawrence Fuller. 5 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 Q. But company. 11 Q. Bus company. 11 Q. Bus company. 11 Q. Bus company. 11 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 21 talked about sand the 21 whether or not she wants to waive 22 or: 24 the rules, you're entitled to receive a 25 copy of this transcript and review it 26 that matery but and to have what the 27 cour reporter has typed as your 28 testimony. 29 What do you choose to do? 21 THE WITINESS: I'm fine either 22 way. I have confidence:- 23 truth is, it might not have even been 24 filed yet. 25 Q. Who's your attorney? 26 THE WITINESS: I'm fine either 27 Way. I have confidence:- 28 THE WITINESS: Okay. 29 MR. LEONARD: We'd like to see it. 29 Fage 167 THE WITINESS: Okay. MR. ELONARD: We'd like to see it. 20 THE WITINESS: Way. 21 The WITINESS: Way. 31 The WITINESS: Way. 32 The WITINESS: Way. 33 The WITINESS: Way. 34 Thave confidence:- 35 Way. I have confidence:- 36 Way. I have confidence:- 37 THE WITINESS: Way. 38 MR. LEONARD: Okay. Thanks a 39 to everybody. 30 The WITINESS: Thanks. 31 Order thanks every much for your time and Miss 31 Court Reporter, what's regular delivery, 32 Vou've been involved in, either as					-	
type of cases we've talked about and the collections cases, have you ever been a collections cases, have you ever been a party to or a witness in any other to types of cases that you can recall? 14				1 -	· · · · · · · · · · · · · · · · · · ·	
12 type of cases we've talked about and the collections cases, have you ever been a a party to or a witness in any other types of cases that you can recall? 15 types of cases that you can recall? 16 A. I have a personal injury 16 for accuracy or to waive that right and not receive that fight and not receive that and to have what the court reporter has typed as your testimony. 19 testimony. 19 testimony. 20 What do you choose to do? 21 Q. In state court? 21 A. I don't know. It may — the truth is, it might not have even been filed yet. We're — 24 decision. 25 We're weeks or so? NOTARY PUBLIC: Yeah, ten days, two weeks or so? NOTARY PUBLIC: Yeah, ten days, two weeks or so? NOTARY PUBLIC: Yeah, ten days, two weeks or so? NOTARY PUBLIC: Yeah, ten days, two weeks or so? NOTARY PUBLIC: Yeah, ten days, two weeks or so? NOTARY PUBLIC: Yeah, ten days, the filed it yet? 14 A. Yeah, it's — 15 Q. Bus company. 11 Q. Bus company. 11 Q. Bus company? 11 C. Bus company? 11 Q. Bus company? 11 Lead of the filed yet. 16 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness that we haven't 19 Lead of the party or a witness tha		• •			•	
ollections cases, have you ever been a party to or a witness in any other types of cases that you can recall? 14				1		
14 party to or a witness in any other 15 types of case that you can recall? 16 A. I have a personal injury 17 case pending right now. 18 Q. And where is that case 19 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 23 truth is, it might not have even been 24 filed yet. We're 25 Q. Who's your attorney? 26 A. I was on a wheelchair lift 27 O a vacation last summer and the lift 28 or wacation last summer and the lift 29 for hoke and I was thrown 7 feet to the 30 ground. 31 A. Bus company. 4 A. Bus company. 5 Q. But you're not sure if they 11 Q. But you're not sure if they 12 A. No. 28 Q. Okay. Any other cases 19 you've been involved in, either as a 19 party or a witness that we haven't 21 taked about so far, ma'am? 20 A. I have a personal linjury 21 D. A. No. 22 MR. LEONARD: Okay. I don't last sum of the weaks of sor you're been involved in, either as a 19 party or a witness that we haven't laked about so far, ma'am? 20 MR. LEONARD: Okay. I don't last sum of the weaks. In the last sum of the last su		• •		l		
15 types of cases that you can recall? 16	1					
16 for accuracy or to waive that right and not receive that and to have what the court reporter has typed as your testimony. 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may — the truth is, it might not have even been flied yet. We're — 25 Q. Who's your attorney? 25 Q. Who's your attorney? 26 A. Lawrence Fuller. 27 Q. And what's the nature of that matter, ma'am? 28 A. I was on a wheelchair lift ob roke and I was thrown 7 feet to the 7 ground. 29 Q. Who is the defendant or a possible defendant? 20 A. Bus company? 21 A. Yeah, it's — 13 Q. But you're not sure if they filed it yet? 29 A. I was uniter is been filed yet. 20 Q. Okay. Any other cases you've been involved in, either as a 19 party or a witness that we haven't 20 Laked about so far, ma'am? 20 A. Peah, it's — 12 Laked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 22 Laked about so far, ma'am? 29 A. Yeah, it's — 12 Laked about so far, ma'am? 20 A. I'm not sure if it's been filed yet. 21 A. No. 22 MR. LEONARD: Okay. I don't 22 Laked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 22 Laked about so far, ma'am? 22 Laked about so far, ma'am? 23 Laked about so far, ma'am? 23 A. Peah, it's — 12 Laked about so far, ma'am? 24 A. No. 25 MR. LEONARD: Okay. I don't 22 Laked about so far, ma'am? 26 A. I'm not sure if it's been 15 Laked about so far, ma'am? 27 A. No. 28 MR. LEONARD: Okay. I don't 29 Laked about so far, ma'am? 29 A. I'm rot sure if it's been 15 Laked about so far, ma'am? 20 A. Recontant matter ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 22 Laked about so far, ma'am? 23 Laked about so far, ma'am? 24 Court Reporter, what's regular delivery, two weeks. 25 MR. LEONARD: Okay. I don't 29 Laked about so far, ma'am? 26 MR. LEONARD: Okay. I don't 29 Laked about so far, ma'am? 27 Laked about so far, ma'am? 28 A. I'm not sure if it's been 15 Laked about so far, ma'am? 29 A. I'm out sure if it's been 15 Laked about so far, ma'am? 20 A. Bus company? 21 A. No. 22 A. I'm out sure if it's	1			l	·	
17 case pending right now. 18 Q. And where is that case 19 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 23 truth is, it might not have even been 24 filed yet. We're 25 Q. Who's your attorney? 26 A. Lawrence Fuller. 27 Q. And what's the nature of 28 that matter, ma'am? 29 A. Lawrence Fuller. 20 A. Lawrence Fuller. 21 A. Lawrence Fuller. 22 Q. And what's the nature of 33 that matter, ma'am? 4 A. I was on a wheelchair lift 4 on a vacation last summer and the lift 5 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 11 Q. Bus company? 11 Q. Bus company? 11 G. Bus company? 11 A. Yeah, it's 12 Q. Okay. Any other cases 15 you've been involved in, either as a 19 party or a witness that we haven't 20 what do you choose to do? 11 THE WITNESS: I'm fine either 22 way. I have confidence 23 MR. LEONARD: We'd like to see it. 23 MR. LEONARD: We'd like to see it. 24 decision. 25 MR. BACON: We'd like to see it. 26 Court Reporter, what's regular delivery, 27 two weeks. 28 Court Reporter, what's regular delivery, 39 to everybody. 30 to everybody. 31 THE WITNESS: Okay. 40 MR. LEONARD: Okay. Thanks a 41 Court Reporter, what's regular delivery, 41 The witness: Thanks. 42 Court Reporter has typed as your 41 decision. 42 MR. LEONARD: Okay. Thanks a 43 thanks very much for your time and Miss 44 Court Reporter, what's regular delivery, 45 two weeks. 46 NOTARY PUBLIC: Yeah, ten days, 47 two weeks. 48 Q. Who is the defendant or a 49 possible defendant? 49 lot everybody. 40 THE WITNESS: Thanks. 40 Court Reporter, what's regular delivery, 41 The WITNESS: I'm fine either 42 way. I have confidence 43 MR. LEONARD: Okay. Thanks a 44 Court Reporter, what's regular delivery, 55 two weeks. 66 NOTARY PUBLIC: Yeah, ten days, 57 two weeks. 67 In Witness of the defendant or a 68 Q. Who is the defendant or a 79 possible defendant? 70 A. Yeah, it's 71 Q. Bus company and the lift of the days of the defendant or					• • •	
18 Q. And where is that case 19 filed, ma'am? 20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 23 truth is, it might not have even been 24 filed yet. We're 25 Q. Who's your attorney? 26 MR. LEONARD: Well, it's your 27 decision. 28 MR. LEONARD: Well like to see it. Page 167 1 A. Lawrence Fuller. 2 Q. And what's the nature of 3 that matter, ma'am? 4 A. I was on a wheelchair lift 5 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 11 Q. Bus company? 11 Q. Bus you're not sure if they 13 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 What do you choose to do? THE WITNESS: I'm fine either 22 way. I have confidence 23 MR. LEONARD: Well, it's your 24 decision. 25 MR. BACON: We'd like to see it. Page 165 1 THE WITNESS: Okay. 2 MR. LEONARD: May. 3 thanks very much for your time and Miss 4 Court Reporter, what's regular delivery, 5 two weeks or so? 6 NOTARY PUBLIC: Yeah, ten days, 7 two weeks. 8 MR. LEONARD: Okay. Thanks a 10 tot everybody. 11 (Off the record at 4:35 p.m.) 12 A. Yeah, it's 13 Q. Okay. Any other cases 14 you've been involved in, either as a 19 party or a witness that we haven't 19 cate of the defendent of a party or a witness that we haven't 19 cate of the witness that we haven't 19 cate of the destinant of the part of the part of the part of a witness that we haven't 19 cate of the part of				l		
19 filed, ma'am? 20				1		
20 A. Pennsylvania. 21 Q. In state court? 22 A. I don't know. It may the 23 truth is, it might not have even been 24 filed yet. We're 25 Q. Who's your attorney? 26 A. Lawrence Fuller. 27 Q. And what's the nature of 28 that matter, ma'am? 29 A. I was on a wheelchair lift 20 to a vacation last summer and the lift 21 broke and I was thrown 7 feet to the 22 ground. 23 mR. LEONARD: We'll, it's your 24 decision. 25 MR. BACON: We'd like to see it. 26 Page 167 27 THE WITNESS: Okay. 28 MR. LEONARD: We'll like to see it. 27 Page 169 28 MR. LEONARD: All right. Ma'am, 29 thanks very much for your time and Miss 29 Court Reporter, what's regular delivery, 29 two weeks or so? 30 MR. LEONARD: Okay. 31 THE WITNESS: Okay. 40 A. Lawrence Fuller. 41 THE WITNESS: Okay. 42 MR. LEONARD: All right. Ma'am, 43 thanks very much for your time and Miss 44 Court Reporter, what's regular delivery, 45 two weeks or so? 46 NOTARY PUBLIC: Yeah, ten days, 47 two weeks. 48 MR. LEONARD: Okay. Thanks a 49 lot everybody. 40 THE WITNESS: Thanks. 40 (Off the record at 4:35 p.m.) 41 (Off the record at 4:35 p.m.) 42 (Okay. Any other cases) 43 (Okay. Any other cases) 44 (Off the record at 4:35 p.m.) 45 (Off the record at 4:35 p.m.) 46 (Off the record at 4:35 p.m.) 47 (Off the record at 4:35 p.m.) 48 (Okay. Any other cases) 49 (Okay. Any other cases) 40 (Okay. Any other cases) 41 (Off the record at 4:35 p.m.) 41 (Off the record at 4:35 p.m.) 42 (Okay. Any other cases) 43 (Okay. Any other cases) 44 (Okay. Any other cases) 45 (Okay. Any other cases) 46 (Okay. Any other cases) 47 (Okay. Any other cases) 48 (Okay. Any other cases) 49 (Okay. Any other cases) 40 (Okay. Any other cases) 41 (Okay. Any other cases) 42 (Okay. Any other cases) 43 (Okay. Any other cases) 44 (Okay. Any other cases) 45 (Okay. Any other cases) 46 (Okay. Any other cases) 47 (Okay. Any other cases) 48 (Okay. Any other cases) 49 (Okay. Any other cases) 40 (Okay. Any other cases) 41 (O					·	
21 Q. In state court? 22 A. I don't know. It may — the 23 truth is, it might not have even been 24 filed yet. We're — 25 Q. Who's your attorney? 26 Q. A. Lawrence Fuller. 27 Q. And what's the nature of 28 that matter, ma'am? 29 Q. And what's the nature of 30 that matter, ma'am? 40 A. I was on a wheelchair lift 50 no a vacation last summer and the lift 60 broke and I was thrown 7 feet to the 70 ground. 81 Q. Who is the defendant or a 91 possible defendant? 91 Q. But you're not sure if they 11 Q. Bus company? 12 A. Yeah, it's — 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a party or a witness that we haven't 20 MR. LEONARD: I'm not sure if they 20 And what's regular delivery, tow weeks or so? 6 NOTARY PUBLIC: Yeah, ten days, tow weeks. 8 MR. LEONARD: Okay. Thanks a lot everybody. 10 THE WITNESS: Thanks. 11 (Off the record at 4:35 p.m.) 12 A. Yeah, it's — 13 Q. Okay. Any other cases 14 you've been involved in, either as a 18 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 22 . 23 AmR. LEONARD: Well, it's your 24 decision. 25 MR. LEONARD: Well, it's your 24 decision. 27 MR. LEONARD: Well, it's your 28 MR. LEONARD: Well, it's your 29 MR. LEONARD: Okay. 20 NOTARY PUBLIC: Yeah, ten days, tow weeks or so? 3 that matter, ma'am? 4 Court Reporter, what's regular delivery, tow weeks or so? 4 Court Reporter, what's regular delivery, tow weeks or so? 5 NOTARY PUBLIC: Yeah, ten days, tow weeks. 8 MR. LEONARD: Okay. Thanks a lot everybody. 10 THE WITNESS: Thanks. 11 (Off the record at 4:35 p.m.) 12					•	
A. I don't know. It may — the truth is, it might not have even been truth is, it might not have even been diffed yet. We're — 24 filed yet. We're — 25 Q. Who's your attorney? 24 decision. 25 MR. BACON: We'd like to see it. Page 167 A. Lawrence Fuller. 2 Q. And what's the nature of that matter, ma'am? 3 thanks very much for your time and Miss 4 A. I was on a wheelchair lift 5 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 9 lot everybody. 10 A. Bus company. 10 A. Bus company? 11 Q. Bus company? 11 Q. Bus company? 11 (Off the record at 4:35 p.m.) 12 A. Yeah, it's — 12 (Off the record at 4:35 p.m.) 15 A. I'm not sure if they 16 filed it yet? 16 D. A. No. 21 A. No. 21 A. No. 22 MR. LEONARD: Okay. I don't 22 have any further questions for you right 24 now, ma'am. I certainly may issue a 22 way. I have confidence — MR. LEONARD: Well, it's your decision. 23 MR. LEONARD: Well, it's your decision. 24 MR. LEONARD: Well, it's your decision. 25 MR. LEONARD: Well, it's your decision. 26 MR. LEONARD: Well, it's your decision. 25 MR. LEONARD: Well, it's your decision. 25 MR. LEONARD: Well, it's your decision. 25 MR. LEONARD: Well, it's your decision. 26 MR. LEONARD: Well, it's your decision. 27 MR. LEONARD: Well, it's your decision		•				
truth is, it might not have even been filed yet. We're 25 Q. Who's your attorney? 24 decision. 25 MR. BACON: We'd like to see it. 27 decision. 25 MR. BACON: We'd like to see it. 28 MR. BACON: We'd like to see it. 28 MR. BACON: We'd like to see it. 29 MR. BACON: We'd like to see it. 20 MR. BACON: We'd like to see it. 21 MR. BAC						
24 filed yet. We ^T re 25 Q. Who's your attorney? 24 decision. 25 MR. BACON: We'd like to see it. Page 167 A. Lawrence Fuller. Q. And what's the nature of that matter, ma'am? A. I was on a wheelchair lift on a vacation last summer and the lift broke and I was thrown 7 feet to the ground. Q. Who is the defendant or a possible defendant? A. Bus company. A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. A. No. MR. LEONARD: All right. Ma'am,		·			•	
25 Q. Who's your attorney? 26 MR. BACON: We'd like to see it. Page 167 1 A. Lawrence Fuller. 2 Q. And what's the nature of 2 MR. LEONARD: All right. Ma'am, 3 thanks very much for your time and Miss 4 Court Reporter, what's regular delivery, 5 two weeks or so? 6 NOTARY PUBLIC: Yeah, ten days, 7 two weeks. Page 167 1 THE WITNESS: Okay. 2 MR. LEONARD: All right. Ma'am, 3 thanks very much for your time and Miss 4 Court Reporter, what's regular delivery, 5 two weeks or so? 6 NOTARY PUBLIC: Yeah, ten days, 7 two weeks. Page 168 1 THE WITNESS: Okay. 2 MR. LEONARD: Okay. Thanks a 9 lot everybody. 3 In THE WITNESS: Thanks. 4 Court Reporter, what's regular delivery, 5 two weeks or so? 8 Okay. 5 Thanks a 9 lot everybody. 6 NOTARY PUBLIC: Yeah, ten days, 7 two weeks. 7 THE WITNESS: Thanks. 9 In THE WITNESS: Thanks. 10 THE WITNESS: Thanks. 11 (Off the record at 4:35 p.m.) 12 A. Yeah, it's	1	· · · · · · · · · · · · · · · · · · ·		1		
Page 169 1 A. Lawrence Fuller. 2 Q. And what's the nature of 3 that matter, ma'am? 4 A. I was on a wheelchair lift 5 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 2 MR. LEONARD: Okay. I don't 2 MR. LEONARD: Okay. I don't 2 A. No. 2 MR. LEONARD: Okay. I don't 2 Aleah, it's 2 Q. MR. LEONARD: Okay. I don't 2 A. No. 2 MR. LEONARD: Okay. I don't 2 Aleah, it's 2 A. No. 2 MR. LEONARD: Okay. I don't 2 A. No. 2 MR. LEONARD: Okay. I don't 2 Aleah, it's 2 A. No. 2 MR. LEONARD: Okay. I don't 2 Aleah, it's 2 A. No. 2 MR. LEONARD: Okay. I don't 2 Aleah, it's 2 A. No. 2 MR. LEONARD: Okay. I don't 2 Aleah, it's 2 A. No. 2 MR. LEONARD: Okay. I don't 2 Aleah, it's 2 A. No. 2 MR. LEONARD: Okay. I don't 2 Aleah, it's 2 A. No. 2 MR. LEONARD: Okay. I don't 2 Aleah, it's 3 Aleah, it's 4 Court Reporter, what's regular delivery, 5 two weeks. 7 two weeks. 7 two weeks. 8 MR. LEONARD: Okay. Thanks a 9 lot everybody. 10 THE WITNESS: Thanks. 10 (Off the record at 4:35 p.m.) 11 (Off the record at 4:35 p.m.) 12 13 (Off the record at 4:35 p.m.) 15						
1 A. Lawrence Fuller. 2 Q. And what's the nature of 3 that matter, ma'am? 4 A. I was on a wheelchair lift 5 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 MR. LEONARD: Okay. I don't 21 A. No. 22 MR. LEONARD: Okay. I don't 22 have any further questions for you right 24 now, ma'am. I certainly may issue a	25	Q. Who's your attorney?		25	MR. BACON: We'd like to see it.	
1 A. Lawrence Fuller. 2 Q. And what's the nature of 3 that matter, ma'am? 4 A. I was on a wheelchair lift 5 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 MR. LEONARD: Okay. I don't 21 A. No. 22 MR. LEONARD: Okay. I don't 23 Avea, it's 24 A. No. 25 A. No. 26 MR. LEONARD: All right. Ma'am, 27 thanks very much for your time and Miss 28 MR. LEONARD: All right. Ma'am, 3 thanks very much for your time and Miss 4 Court Reporter, what's regular delivery, 5 two weeks or so? 6 NOTARY PUBLIC: Yeah, ten days, 7 two weeks. 8 MR. LEONARD: Okay. Thanks a 10 to everybody. 11 (Off the record at 4:35 p.m.) 12 I . 13 . 14 (Off the record at 4:35 p.m.) 15 . 16 . 17 Q. Okay. Any other cases 17 . 18 you've been involved in, either as a 19 party or a witness that we haven't 19 . 20 . 21 A. No. 22 MR. LEONARD: Okay. I don't 23 . 24 .		,	Page 167			Page 169
Q. And what's the nature of that matter, ma'am? A. I was on a wheelchair lift on a vacation last summer and the lift broke and I was thrown 7 feet to the ground. Q. Who is the defendant or a possible defendant? A. Bus company. A. Yeah, it's Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. Q. Okay. Any other cases you've been involved in, either as a party or a witness that we haven't talked about so far, ma'am? A. I was on a wheelchair lift A. I was on a wheelchair lift 4 Court Reporter, what's regular delivery, two weeks or so? 6 NOTARY PUBLIC: Yeah, ten days, 7 two weeks. 8 MR. LEONARD: Okay. Thanks a lot everybody. 10 THE WITNESS: Thanks. 11 (Off the record at 4:35 p.m.) 12 13 Q. But you're not sure if they 14 . 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 19 talked about so far, ma'am? 20 . 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a	1 1	A. Lawrence Fuller.		1	THE WITNESS: Okav.	_
that matter, ma'am? 4				1	· · · · · · · · · · · · · · · · · · ·	
4 A. Í was on a wheelchair lift 5 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 4 Court Reporter, what's regular delivery, two weeks or so? 6 NOTARY PUBLIC: Yeah, ten days, two weeks. 8 MR. LEONARD: Okay. Thanks a lot everybody. 10 THE WITNESS: Thanks. (Off the record at 4:35 p.m.) 12 13 (Off the record at 4:35 p.m.) 15 . 16 . 17 . 18 . 19 party or a witness that we haven't 19 . 20 . 21 A. No. 22 MR. LEONARD: Okay. I don't 22 . 23 have any further questions for you right 24 now, ma'am. I certainly may issue a		•				
5 on a vacation last summer and the lift 6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 MR. LEONARD: Okay. Thanks a 10 IHE WITNESS: Thanks. 11 (Off the record at 4:35 p.m.) 12 13 D. But you're not sure if they 14 In Indian	1			1	· · · · · · · · · · · · · · · · · · ·	
6 broke and I was thrown 7 feet to the 7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 C. Who is the defendant or a 28 MR. LEONARD: Okay. Thanks a 29 lot everybody. 10 THE WITNESS: Thanks. 11 (Off the record at 4:35 p.m.) 12 13 C. Off the record at 4:35 p.m.) 14 C. Off the record at 4:35 p.m.) 15 C. Off the record at 4:35 p.m.) 16 C. Off the record at 4:35 p.m.) 17 C. Off the record at 4:35 p.m.) 18 C. Off the record at 4:35 p.m.) 19 C. Off the record at 4:35 p.m.) 19 C. Off the record at 4:35 p.m.) 10 THE WITNESS: Thanks. 11 (Off the record at 4:35 p.m.) 11 C. Off the record at 4:35 p.m.) 12 C. Off the record at 4:35 p.m.) 13 C. Off the record at 4:35 p.m.) 14 C. Off the record at 4:35 p.m.) 15 C. Off the record at 4:35 p.m.) 16 C. Off the record at 4:35 p.m.) 17 C. Off the record at 4:35 p.m.) 18 C. Off the record at 4:35 p.m.) 19 C. Off the record at 4:35 p.m.) 10 THE WITNESS: Thanks. 11 C. Off the record at 4:35 p.m.) 11 C. Off the record at 4:35 p.m.) 12 C. Off the record at 4:35 p.m.) 12 C. Off the record at 4:35 p.m.) 13 C. Off the record at 4:35 p.m.) 14 C. Off the record at 4:35 p.m.) 15 C. Off the record at 4:35 p.m.) 16 C. Off the record at 4:35 p.m.) 17 C. Off the record at 4:35 p.m.) 18 C. Off the record at 4:35 p.m.) 19 C. Off the record at 4:35 p.m.) 10 C. Off the record at 4:35 p.m.) 11 C. Off the record at 4:35 p.m.) 12 C. Off the record at 4:35 p.m.) 12 C. Off the record at 4:35 p.m.) 13 C. Off the record at 4:35 p.m.) 14 C. Off the record at 4:35 p.m.) 15 C. Off the record at 4:35 p.m.) 16 C. Off the record at 4:35 p.m.) 17 C. Off the record at 4:35 p.m.) 18 C. Off the record at 4:35 p.m.) 19 C. Off the record at 4:35 p.m.) 19 C. Off the recor				1		
7 ground. 8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 8 MR. LEONARD: Okay. Thanks a 10 to everybody. 11 (Off the record at 4:35 p.m.) 12 13 (Off the record at 4:35 p.m.) 14 . 15 15 . 16 . 17 . 18 . 19 . 19 . 20 . 21 . 21 . 22 . 23 have any further questions for you right 23 . 24 .				L		
8 Q. Who is the defendant or a 9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 8 MR. LEONARD: Okay. Thanks a 9 lot everybody. 10 THE WITNESS: Thanks. 11 (Off the record at 4:35 p.m.) 12 13 (Off the record at 4:35 p.m.) 14 . 15 15 . 16 . 17 . 18 . 19 party or a witness that we haven't 19 . 20 . 21 . 22 . 23 have any further questions for you right 24 .				i		
9 possible defendant? 10 A. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 9 lot everybody. 10 THE WITNESS: Thanks. 11 (Off the record at 4:35 p.m.) 12 13	1 '	J. ~ ~		/	two weeks.	
10 A. Bus company. 11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a	18	O. Who is the defendant or a		1 1		
11 Q. Bus company? 12 A. Yeah, it's 13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 11 (Off the record at 4:35 p.m.) 12 13 (Off the record at 4:35 p.m.) 14 . 15 15 . 16 . 17 . 18 . 19 . 10 . 11 (Off the record at 4:35 p.m.) 19 . 10 . 11 . 12 13 . 14 . 15 . 16 . 17 . 18 . 19 . 10 . 11 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 10 . 11 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 10 . 11 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 10 . 10 . 11 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 10 . 10 . 11 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 11 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 11 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 11 . 12 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 11 . 11 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 10 . 11 . 11 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 11 . 11 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 11 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 11 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 10 . 11 . 12 . 12 . 13 . 14 . 15 . 16 . 17 . 18 . 19 . 19 . 10 . 10 . 10 . 10 . 10 . 10 . 10 . 10				8	MR. LEONARD: Okay. Thanks a	
12	9	possible defendant?		8 9	MR. LEONARD: Okay. Thanks a lot everybody.	
13 Q. But you're not sure if they 14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a	9	possible defendant? A. Bus company.		8 9 10	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
14 filed it yet? 15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a	9 10 11	possible defendant? A. Bus company. Q. Bus company?		8 9 10 11	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
15 A. I'm not sure if it's been 16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a	9 10 11 12	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's		8 9 10 11 12	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
16 filed yet. 17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a	9 10 11 12 13	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they		8 9 10 11 12 13	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
17 Q. Okay. Any other cases 18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 17 . 18 . 19 . 20 . 21 . 22 .	9 10 11 12 13 14	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet?		8 9 10 11 12 13 14	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
18 you've been involved in, either as a 19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 18 . 19 . 20 . 21 . 22 .	9 10 11 12 13 14 15	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been		8 9 10 11 12 13 14 15	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
19 party or a witness that we haven't 20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 25 .	9 10 11 12 13 14 15 16	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet.		8 9 10 11 12 13 14 15 16	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
20 talked about so far, ma'am? 21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 25 . 26 . 27 .	9 10 11 12 13 14 15 16 17	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. Q. Okay. Any other cases		8 9 10 11 12 13 14 15 16	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
21 A. No. 22 MR. LEONARD: Okay. I don't 23 have any further questions for you right 24 now, ma'am. I certainly may issue a 21 . 22 . 23 . 24 .	9 10 11 12 13 14 15 16 17 18	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. Q. Okay. Any other cases you've been involved in, either as a		8 9 10 11 12 13 14 15 16 17 18	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
22 MR. LEONARD: Okay. I don't 22 . 23 have any further questions for you right 23 . 24 now, ma'am. I certainly may issue a 24 .	9 10 11 12 13 14 15 16 17 18 19	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. Q. Okay. Any other cases you've been involved in, either as a party or a witness that we haven't		8 9 10 11 12 13 14 15 16 17 18 19	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
23 have any further questions for you right 23 . 24 now, ma'am. I certainly may issue a 24 .	9 10 11 12 13 14 15 16 17 18 19 20	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. Q. Okay. Any other cases you've been involved in, either as a party or a witness that we haven't talked about so far, ma'am?		8 9 10 11 12 13 14 15 16 17 18 19 20	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
24 now, ma'am. I certainly may issue a 24 .	9 10 11 12 13 14 15 16 17 18 19 20 21	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. Q. Okay. Any other cases you've been involved in, either as a party or a witness that we haven't talked about so far, ma'am? A. No.		8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
1 ' '	9 10 11 12 13 14 15 16 17 18 19 20 21 22	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. Q. Okay. Any other cases you've been involved in, either as a party or a witness that we haven't talked about so far, ma'am? A. No. MR. LEONARD: Okay. I don't		8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
25 document production request, based upon 25 .	9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. Q. Okay. Any other cases you've been involved in, either as a party or a witness that we haven't talked about so far, ma'am? A. No. MR. LEONARD: Okay. I don't have any further questions for you right		8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	
	9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	possible defendant? A. Bus company. Q. Bus company? A. Yeah, it's Q. But you're not sure if they filed it yet? A. I'm not sure if it's been filed yet. Q. Okay. Any other cases you've been involved in, either as a party or a witness that we haven't talked about so far, ma'am? A. No. MR. LEONARD: Okay. I don't have any further questions for you right now, ma'am. I certainly may issue a		8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MR. LEONARD: Okay. Thanks a lot everybody. THE WITNESS: Thanks.	

		U	Filed 03/00/2006 Fage 24 01 24	
	Page 170			Page 172
1	CEFARATTI GROUP FILE NO. 13289	1	CERTIFICATE	
2	CASE CAPTION: DISABLED PATRIOTS OF	2		
3	AMERICA VS. TOWN & COUNTRY CHICAGO	3	State of Ohio) SS.:	
4	DEPONENT: BONNIE KRAMER	4	County of Cuyahoga.)	
5	DEPOSITION DATE: JANUARY 30, 2008	5	I, Kathy Davian, a Notary Public	
6	DEI 00111014 D/1121 J/1110/11(1 00) 2000	6	within and for the State of Ohio, duly	
7	(SIGN HERE)	7	commissioned and qualified, do hereby	
8	The State of Ohio,)	8	certify that the within named witness,	
9	County of Cuyahoga) SS:	9	was duly sworn to testify the truth, the	
10	Before me, a Notary Public in and	10	whole truth and nothing but the truth in	
11	for said County and State, personally	11	the cause aforesaid; that the testimony	
12	appeared BONNIE KRAMER, who acknowledged	12	then given by the witness was by me	
13	that he/she did read his/her transcript	13	reduced to stenotypy in the presence of	j
14	in the above-captioned matter, listed	14	said witness; afterwards transcribed,	
15	any necessary corrections on the	15	and that the foregoing is a true and	
16	accompanying errata sheet, and did sign	16	correct transcription of the testimony	
17	the foregoing sworn statement and that	17	so given by the witness.	
18	the same is his/her free act and deed.	18	I do further certify that this	
19	IN TESTIMONY WHEREOF, I have	19	deposition was taken at the time and	1
20	hereunto affixed my name and official	20	place in the foregoing caption	ŀ
21		21	specified.	
22	· ·	22	I do further certify that I am	
23	day of , A.D. 2008.	23	not a relative, counsel or attorney for	
24	•	24	either party, or otherwise interested in	
25	Notary Public Commission Expires	25	the event of this action.	ŀ
23	Notary Fublic Continussion Expires	25	the event of this action.	l:
				·
	Page 171			Page 173
1	-	1	I am not, nor is the court	Page 173
1 2	ERRATA SHEET	ı	I am not, nor is the court reporting firm with which I am	Page 173
2	-	1 2 3	reporting firm with which I am	Page 173
2 3	ERRATA SHEET	2	reporting firm with which I am affiliated, under a contract as defined	Page 173
2 3 4	ERRATA SHEET	2 3	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).	Page 173
2 3 4 5	ERRATA SHEET	2 3 4 5	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have	Page 173
2 3 4	ERRATA SHEET	2 3 4	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of	Page 173
2 3 4 5 6 7	ERRATA SHEET	2 3 4 5 6	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have	Page 173
2 3 4 5 6	ERRATA SHEET	2 3 4 5 6 7	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of	Page 173
2 3 4 5 6 7 8	ERRATA SHEET	2 3 4 5 6 7 8	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of	Page 173
2 3 4 5 6 7 8 9	ERRATA SHEET	2 3 4 5 6 7 8 9	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of	Page 173
2 3 4 5 6 7 8 9 10 11	ERRATA SHEET	2 3 4 5 6 7 8 9	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.	Page 173
2 3 4 5 6 7 8 9 10 11 12	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public	Page 173
2 3 4 5 6 7 8 9 10 11 12 13	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D). IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008. Kathy Davian, Notary Public within and for the State of Ohio	Page 173